NOTICE

All drawings located at the end of the document.

Interim Status Closure Plan Solid Waste Management Unit 15 (Storage Pad 904)

For U.S. D.O.E.-Rocky Flats Plant Low-Level Mixed Wastes

CO7890010526

30 September 1989



A-SW-000302

REVIEWED FOR CLASSIFICATION/UCNI

Interim Status Closure Plan Solid Waste Management Unit 15 (Storage Pad 904)

For U.S. D.O.E.-Rocky Flats Plant Low-Level Mixed Wastes

CO7890010526

30 September 1989



Rockwell International

REVIEWED FOR CLASSIFICATION/UCNI

By F J Curran

TABLE OF CONTENTS

SECT	TION	PAGE
1.0	INTRODUCTION	1
	1.1 Plant Location and Mission	1
	1.2 Closure Plan Purpose	3
2.0	FACILITY DESCRIPTION	5
	2.1 Facility Location and Specifications	5
	2.2 Facility Operation	9
	2.2.1 Periods of Operation	9
	2.2.2 Maximum Waste Inventory	
	2.2.3 Types of Waste Managed	12
	2.2.4 Waste Process Description	15
	2.2.5 Monitoring and Containment Systems	
		21
	2.2.5.1 Air monitoring and	
	containment	21
	2.2.5.2 Surface water monitoring and	
	containment	25
	2.2.5.3 Soil monitoring and	
	containment	27
	2.2.5.4 Groundwater monitoring and	
	containment	41
	2.2.5.4.1 Regional Alluvial	
	Geology	41
	2.2.5.4.2 Regional Bedrock Geology .	43
	2.2.5.4.3 Site Alluvial Geology	46
	2.2.5.4.4 Site Bedrock Geology	50
	2.2.5.4.5 Site Alluvial	
	Hydrogeology	50
	2.2.5.4.6 Site Bedrock	
	Hydrogeology	53
	2.2.6 Releases	
	2.2.6.1 Releases to the Pad	
	2.2.6.2 Releases to the Air	
	2.2.6.3 Releases to Surface Water	66
	2.2.6.4 Releases to Soil	
	2.2.6.5 Releases to Groundwater	
3.0	CLOSURE PLAN SUMMARY	86
	3.1 Closure Objectives	86
	3.2 Closure Activities	86
	3.3 Closure Schedule	87
	3.4 Administration of the Closure Plan	89
4.0	REMOVAL OF HAZARDOUS WASTE INVENTORY	90
5.0	OFF-SITE WASTE MANAGEMENT	91

TABLE OF CONTENTS (CONT.)

SECT:	ION	PAGE
6.0	DECONTAMINATION	. 92
	6.1 Closure Performance Criteria	
	6.2 Decontamination of Pad 904	. 96
	6.3 Decontamination of Auxiliary Equipment	
	6.4 Decontamination of Equipment Used During Closure	. 99
	6.5 Contaminated Soils	. 99
	6.6 Removal of Hazardous Waste Residues	
7.0	DECONTAMINATION VERIFICATION	. 101
	7.1 Pad 904	. 101
	7.2 Surface Water	. 102
	7.3 Soils	. 102
	7.3.1 Beneath Pad 904	. 102
	7.3.2 Adjacent to Pad 904	. 103
	7.4 Groundwater	. 104
	7.5 Analytical Methods	. 104
8.0	CLOSURE SCHEDULE	. 105
9.0	CLOSURE COST AND FINANCIAL ASSURANCE	. 106
10.0	SITE ACCESS AND SECURITY	. 108
11.0	HEALTH AND SAFETY	. 109
12.0	POST-CLOSURE MONITORING	. 110
13.0	CLOSURE CERTIFICATION	. 111
14.0	REFERENCES	. 112

LIST OF TABLES

TABLE	NUMBER	TITLE	PAGE
:	1	Pondcrete Hazardous Waste Numbers and Maximum Concentrations of Hazardous Constituents	13
;	2	Saltcrete Hazardous Waste Numbers and Maximum Concentrations of Hazardous Constituents	16
:	3	Summary of Soil Chemical Data at and Near Pad 904 Pondcrete Storage Area	29
•	4	Groundwater Sampling Parameters	58
!	5	Isotope Specific Analyses Before Spill (June 26, 1988) and After Spill (July 22, 1988)	75
	6	Groundwater Concentrations in the Area of Pad 904	81
	7	Mobility of Hazardous Compounds Identified in Saltcrete or Pondcrete	94
;	8	Decontamination Indicators	95
!	9	General Purpose Decontamination Solutions for Hazardous, Radioactive and TRU-Mixed Wastes	97
1	0	Cost Estimate for Closure of Unit 15	107

LIST OF FIGURES

FIGURE	NUMBER	TITLE	PAGE
1		Vicinity Map	2
2		Rocky Flats Plant Controlled Area	6
3		Pad 904 - Location Map	7
4		Pad 904 - Details	8
5		Waste Process Description	20
6		Ambient Air Monitoring Locations	23
7		Plutonium-239 Isoconcentrations in Soil (April, 1987)	28
8		Plutonium-239 Isoconcentrations in Soil (August/September, 1987)	31
9		Nitrate Isoconcentrations in Soil (May, 1988)	33
10		Plutonium-239 Isoconcentrations in Soil (May, 1988)	34
11		Uranium-234 Isoconcentrations in Soil (May, 1988)	35
12		Uranium-238 Isoconcentrations in Soil (May, 1988)	36
13		Americium-241 Isoconcentrations in Soil (October, 1988)	38
14		Total Plutonium Isoconcentrations in Soil (October, 1988)	39
15		Total Uranium Isoconcentrations in Soil (October, 1988)	40
16		Geologic Cross-Section Location Map	42
17		Generalized Geologic Cross Section	44
18		Geologic Cross-Section A-A'	47
19		Geologic Cross-Section B-B'	48
20		Geologic Cross-Section C-C'	49

LIST OF FIGURES (Con't)

FIGURE	NUMBER	TITLE	PAGE
21		Alluvial Aquifer Potentiometric Map (April, 1988)	51
22		Bedrock Aquifer Potentiometric Map (April, 1988)	54
23		Pad 904 Surface Water Flow Patterns	68
24		Rocky Flats and Boulder Precipitation Data	69
25		Gross Alpha Concentrations in Puddle Samples	71
26		Gross Beta Concentrations in Puddle Samples	72
27		Nitrate Concentrations in Puddle Samples	73
28		Probability of Gross Alpha Concentrations in Pad 904 Runoff	76
29		Probability of Gross Beta Concentrations in Pad 904 Runoff	77
30		Probability of Gross Nitrate Concentrations in Pad 904 Runoff	78
31		Schedule of Closure Activities	88

V

LIST OF APPENDICES

- APPENDIX A PRODUCTION PROCESS DESCRIPTION FOR PONDCRETE AND SALTCRETE FROM SECTION D OF RCRA PART B PERMIT
- APPENDIX B BORING LOGS FOR WELLS IN THE AREA OF PAD 904
- APPENDIX C HYDROGRAPHS FOR WELLS IN THE AREA OF PAD 904
- APPENDIX D RCRA CONTINGENCY IMPLEMENTATION PLAN REPORTS
 AND MONTHLY PONDCRETE STATUS REPORTS
- APPENDIX E PAD 904 RUNOFF DATA

PART/REQUIREMENT

Subpart A - General

Purpose, scope, and applicability.

- that define the acceptable management of hazardous waste during the The purpose of this part is to establish minimum state standards period of interim status and until certification of final closure... ٠ لا
- facilities that treat, store or dispose of hazardous waste who have fully complied with the requirements for interim status under section 3005(e) of RCRA and Parts 99 and 100 of this Chapter until either a permit is issued or until applicable Part 265 closure and post-closure responsibilities are fulfilled, and to those owners and operators of facilities in existence on November 19, 1980 who The standards of this part apply to owners and operators of have failed to provide timely notification as required by Section 3010(a) of RCRA and/or failed to file Part A of the permit application as required by Parts 99 and 100 of these regulations, except as specifically provided otherwise in this Part or Part 261 of these regulations.* <u>ب</u>

*These provisions, with regard to off-site disposal facilities, will be applied in accordance with C.R.S. 1973, 25-15-101 et seg.

SECTION CLOSURE PLAN

PART/REQUIREMENT

1.0

Subpart G - Closure and Post Closure

Applicability. 265.110

Except as § 265.1 provides otherwise: a. Sections § § 265.111-265.115 (which concern closure) apply to the owners and operators of all hazardous waste management facilities.

Closure Performance Standard

265.111

The owner or operator must close his facility in a manner that:

3.0,6.0,7.0

- Minimizes the need for further maintenance; and а Ю
- hazardous waste, hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition products to the ground or protect human health and the environment, post-closure escape of Controls, minimizes or eliminates, to the extent necessary surface water or to the atmosphere; and <u>.</u>
- Complies with the closure requirements of this Subpart... ວ່

CLOSURE PLAN

SECTION

PART/REQUIREMENT

Closure Plans; amendment of plan

265.112

Written plan. ٠ و

265.115, a copy of the most current plan must be furnished to the management facility must have a written closure plan. Until final Section for facilities without approved plans, it must also be provided during site inspection, on the day of inspection, to any officer, employee or representative of the Department who is duly designated Department upon request, including request by mail. In addition, a hazardous closure is completed and certified in accordance with or operator of owner the 1981, by the Director. By May 19.

Content of plan. <u>ب</u>

final closure of the facility at any point during its active life. The closure plan must include, at least: The plan must identify the steps necessary to perform partial and/or

A description of how each hazardous waste management unit at the facility will be closed in accordance with Section 265.111; ,

8.0

4.0,5.0

ix

PART/REQUIREMENT

7

- operations which will be unclosed during the active life A description of how final closure of the facility will extent of be conducted in accordance with Section 265.111. description must identify the maximum of the facility; and
- ıf description of the methods to be used during partial closures removing, transporting, treating, storing, or disposing of all hazardous wastes, and identification of the type(s) of the on-site over the active life of the facility and a detailed and final closure, including, but not limited to, methods for ever off-site hazardous waste management units to be used, An estimate of the maximum inventory of hazardous wastes applicable; and
- to, procedures for cleaning equipment and removing contaminated soils, methods for sampling and testing surrounding soils, and decontaminate all hazardous waste residues and contaminated containment system components, equipment, structures, and soils during partial and final closure, including, but not limited decontamination necessary to satisfy the closure performance standard; and description of the steps needed to remove extent of determining the criteria for A detailed

.

CLOSURE PLAN SECTION

PART/REQUIREMENT

3

9

- closures and final closure satisfy the closure performance ground-water A detailed description of other activities necessary during the partial and final closure period to ensure that all partial including, but not control; and monitoring,
- A schedule for closure of each hazardous waste management unit The schedule must include, at a minimum, the total time required for intervening closure activities which will allow tracking of the progress (For example, in the case of a landfill unit, estimates of the time required to treat or required to place a final cover must be included); and all hazardous waste inventory and of and for final closure of the facility. of partial and final closure. dispose of
- facilities that use trust funds to demonstrate financial assurance under Section 266.14 and whose remaining operating life is less than twenty years, and for facilities without final closure expected year of approved closure plans. As estimate of the

SECTION

PART/REQUIREMENT

Amendment of plan. ς.

written request to the Department to authorize a change to the An owner or operator with an approved closure plan must submit a approved closure plan. The written request must include a copy of The owner or operator may amend the closure plan at any time prior to the notification of partial or final closure of the facility. the amended closure plan for approval by the Department.

Changes in operating plans for facility design affect the The owner or operator must amend the closure plan whenever:

7.0

closure plan, or

There is a change in the expected year of closure, if applicable, or ii.

unexpected events require a modification of the closure activities, closure or final In conducting partial iii.

operation, or no later than 60 days after an unexpected event has occurred which has affected the closure plan. If an The owner or operator must amend the closure plan at least 60 days prior to the proposed change in facility design or 7

8.0

PART/REQUIREMENT

These provisions also apply to the owner or operator must amend the closure plan no later than 30 owners or operators of surface impoundments and waste piles who intended to remove all hazardous waste at closure, but are required unexpected event occurs during the partial or final closure period, to closure as landfills in accordance with Section 265.310. days after the unexpected event.

the submit written comments on the plan and request modification of the response to a request or at his own discretion, hold a public hearing whenever such a hearing might clarify one or more issues The Director will give public notice (Public notice of the opportunity for the public to submit written comments, and the two The Department will approve or modify this plan in writing within 60 days. If the Department modifies the plan, this modified plan The Department will approve, modify, or the owner or operator must The Department's decision must modify the plan or submit a new plan for approval within 30 days. He will also, ΙĘ the hearing may be given at the same time as notice the plan within 90 days of its receipt. The Director will provide the owner or operator and the public, through a newspaper notice, the opportunity to concerning a closure plan. The Director will give of the hearing at least 30 days before it occurs. plan within 30 days of the date of the notice. Department does not approve the plan, becomes the approved closure plan. notices may be combined.) disapprove of

ਰ

8.0

REGULATORY CHECKLIST FOR UNIT 15 (Con't) PONDCRETE STORAGE AREA PAD 904

PART/REQUIREMENT

265.113, 265.114, and 265.115... A copy of this modified plan must assure that the approved closure plan is consistent with § 265.111, be mailed to the owner or operator.

Closure; time allowed for closure.

265.113

<u>ب</u>

- The or operator must treat, remove from the site, or dispose of on-site all Department may approve a longer period using the procedures under 90 days after approval of the closure, if that is later, the owner Within 90 days after receiving the final volume of hazardous wastes, hazardous wastes in accordance with the approved closure plan. 265.112(d) if the owner or operator demonstrates that:
- i. The activities required to comply with this paragraph will, of necessity, take him longer than 180 days to complete;
 - ii. (a) The facility has the capacity to receive additional wastes;
 - (b) There is a reasonable likelihood that a person other than the owner or operator will recommence operation of the site; and

PART/REQUIREMENT

would be incompatible with continued operation of the facility of the site; and Closure <u>U</u>

and all steps to prevent threats to human health He has taken and will continue to take the environment. ς.

8.0

closure activities in accordance with the approved closure plan and within 180 days after receiving the final volume of wastes or 180 days after approval of the closure period using the procedures under § 265.112(c) if the owner or operator demonstrates that: owner or operator must complete ά.

of necessity, take him longer than 180 days The facility has the capacity will, activities closure to complete; The (a) į.

reasonable to receive additional waste; ಡ There <u>@</u>

likelihood that a person other than the owner or operator will operation of recommence

CLOSURE PLAN SECTION

PART/REQUIREMENT

(c) Closure of the facility
would be incompatible with
continued operation of the
site; and

2. He has taken and will continue to take all steps to prevent threats to human health and the environment from the unclosed but inactive facility.

Disposal or decontamination of equipment.

265.114

- and or decontaminated by removing all hazardous waste and residues. of, facility equipment disposed properly all been completed, have closure is must structures When . ਲ
- Physical contact with the waste, structures, or equipment within the active portion of the facility will not injure unknowing or unauthorized persons or livestock which may enter the active portion of a facility, and

6.0

10.0,12.0

PART/REQUIREMENT

facility, will not cause a violation of the Disturbance of the waste or equipment, by the unknowing or unauthorized entry of persons or of portion the active requirements of this part. onto livestock 2

Unless exempt under paragraphs (a)(1) and (a)(2) of this section, a facility must have: Ď.

monitoring or surveillance by guards or facility personnel) which continuously monitors and controls surveillance system (e.g., television entry onto the active portion of the facility; or monitoring A 24-hour ?

surrounds the active portion of the facility; and An artificial or natural barrier (e.g., combined with a cliff), which completely a fence in good repair or a fence

through the gates or other entrances to an attendant, television monitors, locked entrance, or controlled roadway access to A means to control entry, at all times, the active portion of the facility (e.g., ii.

CLOSURE PLAN SECTION

REGULATORY CHECKLIST FOR UNIT 15 (Con't)
PONDCRETE STORAGE AREA PAD 904

PART/REQUIREMENT

ບ່

section, a sign with the legend, "Danger - Unauthorized Personnel Keep Out", must be posted at each entrance to the active portion of a facility, and at other locations in (a)(2) of this
- Unauthorized sufficient numbers to be seen from any approach to the active the facility and must be legible from a distance of at least 25 feet. Existing signs with a legend other than "Danger to enter the active portion, and the entry onto the active The legend must be written in English and in any Unauthorized Personnel Keep Out" may be used if the legend on the sign indicates that only authorized personnel are allowed area surrounding and (a)(1)ın the exempt under paragraphs other language predominant portion can be dangerous. portion.

Certification of closure.

254.115

the owner or operator must submit to the Department certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure. owner or When closure is completed,

2.0

REGULATORY CHECKLIST FOR UNIT 15 (Con't) PONDCRETE STORAGE AREA PAD 904

PART/REQUIREMENT

Subpart I - Use and Management of Containers

Applicability*

265.170

The regulations in this Subpart apply to owners and operators of all hazardous waste facilities that store containers of hazardous waste, except as § 265.1 provides otherwise.

Condition of containers.

265.171

waste from this container to a container that is in good condition, or manage the waste in some other way that complies with the requirements it begins to leak, the owner or operator must transfer the hazardous If a container holding hazardous waste is not in good condition, or if

CLOSURE PLAN SECTION

PART/REQUIREMENT

Compatibility of waste with container.

The owner or operator must use a container made of or lined with materials which will not react with, and are otherwise compatible with, the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired.

Management of containers.*

265.173

during storage, except when it is necessary to add or remove A container holding hazardous waste must always be closed waste. . ھ

2.0

handled, or stored in a manner which may rupture the container A container holding hazardous waste must not be opened, or cause it to leak. Ď.

Inspections

265.175

stored, at least weekly, looking for leaks and for deterioration The owner or operator must inspect areas where containers are caused by corrosion or other factors.

2.0

0.6

CLOSURE

REGULATORY CHECKLIST FOR UNIT 15 (Con't) PONDCRETE STORAGE AREA PAD 904

PART/REQUIREMENT

Transportation regulations and the Colorado Public Utilities Commission, including Department u.s. governed by *Re-use of containers in transportation is those set forth in 49 CFR 173.28.

Part 266 Colorado Financial Requirements

Applicability

266.10

- (a). The requirements of Section 266.12, 266.14 and 266.16 through 266.17 apply to owners and operators of all hazardous waste facilities, except as provided otherwise in this section or in § 264.1.
- (c). The State of Colorado and the Federal Government are exempt from the requirements of Part 266 of these regulations.

INTERIM STATUS CLOSURE PLAN SOLID WASTE MANAGEMENT UNIT #15 STORAGE PAD 904

1.0 INTRODUCTION

1.1 Plant Location and Mission

The U.S. Department of Energy's Rocky Flats Plant is located in north-central Colorado, northwest of the City of Denver (Figure 1). The Plant is located in Sections 1 through 4 and 9 through 15 of T.1 S., R. 70 W. The facility's EPA identification number is CO 7890010526. The mailing address is:

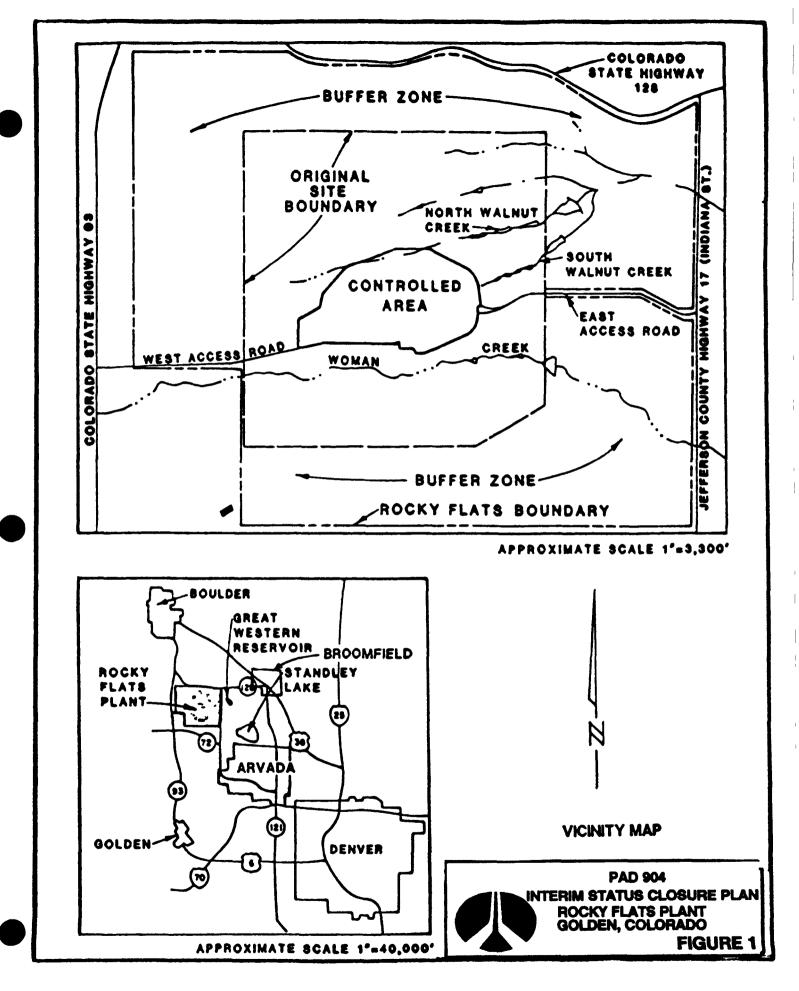
U.S. Department of Energy Rocky Flats Plant P.O. Box 464 Golden, CO 80402

The facility contact is:

David P. Simonson
Manager
Department of Energy
Rocky Flats Operations (RFO)
Phone: 303-966-2025

Rockwell International is the prime operating contractor for Rocky Flats Plant (since June 1975) under the general direction of the U.S. Department of Energy (DOE), Washington D.C. Headquarters. As a government-owned and contractor-operated facility, the Rocky The primary Plant mission is to produce plutonium components for Flats

PAD 904 INTERIM STATUS CLOSURE PLAN



Plant comprises a portion of the nationwide nuclear weapons production complex.

The primary Plant mission is to produce plutonium components for nuclear weapons. Plutonium, uranıum, beryllıum, and stainless steel parts are fabricated at the Plant and shipped off-site for final Additional activities include chemical processing to recover plutonium from scrap material, metallurgical research and machining, assembly, non-destructive development, coatings, remote engineering, chemistry, and physics. handling operations at the Rocky Flats Plant include storage, transport, treatment, and packaging of waste materials generated The waste forms that are handled include hazardous on-site. chemical waste, transuranic (TRU) waste, non-hazardous. non-radioactive waste, and combinations thereof. Specifically, this Interim Status Closure Plan addresses containerized storage of mixed low-level radioactive and hazardous waste.

1.2 Closure Plan Purpose

Submittal of a closure plan is required to ensure that facilities that cease handling hazardous waste do not pose a long-term threat to human health and the environment. A RCRA Part B Permit Application has been prepared and submitted by the Rocky Flats Plant that includes a description of the operations at Solid Waste Management Unit (SWMU) Number 15. This unit is commonly referred to as the 904 Storage Pad, or Pad 904. Pad 904 currently is operating as an interim status storage unit (SWMU No. 15). Closure plans for units that have interim status and are currently out of service have been appended to the RCRA Post-Closure Care Permit Application. Only the section of this unit which stores Pondcrete

PAD 904 INTERIM STATUS CLOSURE PLAN

and Saltcrete will be closed under interim status since an operating permit will not be issued for this unit.

This closure plan describes activities necessary to close Pad 904 in compliance with the Part 265 closure regulations and in accordance with the Compliance Agreement entered into by the U.S. Environmental Protection Agency (EPA), DOE, and the Colorado Department of Health (CDH). This plan addresses Colorado Hazardous Waste Regulations under 6 CCR 1007-3, Part 265, Subpart G, Closure and Post-Closure; Section 265, Subpart I, Use and Management of Containers; and equivalent Federal regulations.

PAD 904 INTERIM STATUS CLOSURE PLAN

2.0 FACILITY DESCRIPTION

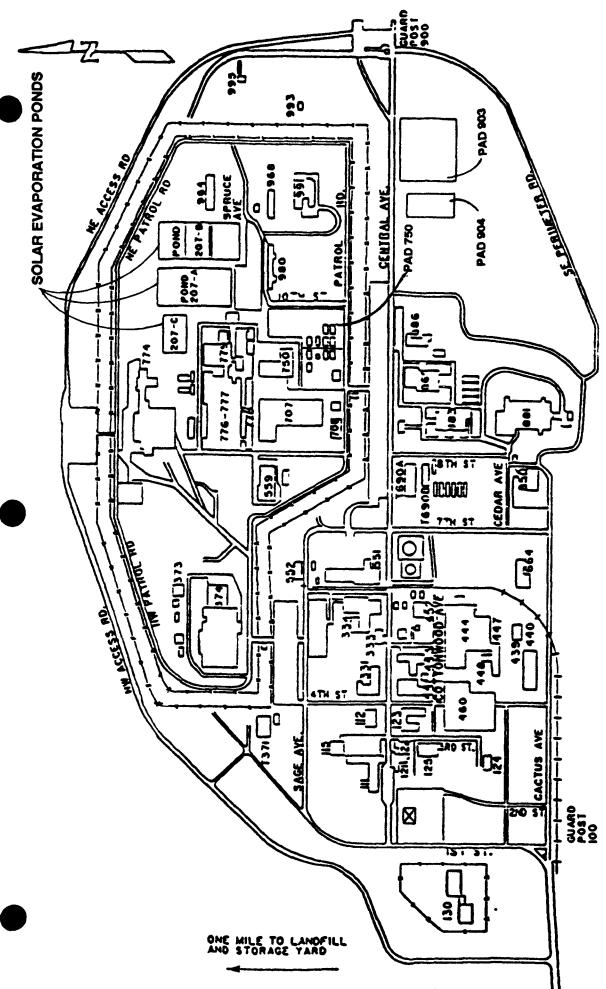
2.1 Facility Location and Specifications

Pad 904 is located in the southeastern portion of the plant production area (Figure 2). The Pad was constructed, in August 1987, of hot bituminous pavement, three inches thick, which was placed over six inches of Class 6 course aggregate base which had been placed on regraded native soil (Figures 3 and 4). In-place soils were regraded and scarified prior to laying down the pavement for the pad. Soils removed from the pad area were pushed to the far west side of the pad. Pad 904 occupies a 129,505 square foot rectangular area, measuring 439 feet in the north-south direction and 295 feet in the east-west direction. Access to the Pad is provided from the northeast corner of the Pad. The perimeter of the Pad is fenced and identification/warning signs are placed on this fencing.

Pad 904 is sloped at approximately 0.7 percent to the northeast with run-off being intercepted by a ditch sloped to drain to the north. The ditch is located east of Pad 904 (Figure 3). No secondary containment structures were originally provided since the Pad was being used solely for containerized solid waste and no requirements existed in the regulations for secondary containments.

On June 6, 1988, six inch high asphalt berms were constructed around the west, north and east perimeter of Pad 904 (Figure 4). These berms were constructed in an attempt to collect surface water runoff samples from the Pad area. This berm also minimizes runon. All Pondcrete storage has been done within the bermed area, designated Area A (Figure 4). The unbermed area, Area B, has been

PAD 904 INTERIM STATUS CLOSURE PLAN



PAD 904
INTERIM STATUS CLOSURE PLAN
ROCKY FLATS PLANT
GOLDEN, COLORADO
FIGURE 2

ROCKY FLATS PLANT CONTROLLED AREA

PAD 904 INTERIM STATUS CLOSURE PLAN

Figure 4

PAD 904 INTERIM STATUS CLOSURE PLAN

used for storage of other wastes and for operations related to Pad 904 activities (Figure 4).

It is anticipate that by December 1989 weatherproof shelters for the storage of pondcrete and saltcrete will be constructed and in use on Pad 904. These shelters will be modular, stressed membrane, relocatable structures which will require no excavation which will alter drainage off the Pad.

2.2 Facility Operation

2.2.1 Periods of Operation

Operation of Pad 904 as a containerized low-level mixed waste storage area for Pondcrete, a mixture consisting of solar evaporation pond clean-out sludge mixed with cement, was the result of:

- o The lack of a low-level mixed waste disposal facility to accept the Pondcrete,
- o The need for continued production of Pondcrete during solar pond closure activities,
- o During the spring of 1987 storage of Pondcrete at the existing Pondcrete storage area (Pad 750) was approaching capacity.

For the reasons listed above, the Pad 904 location was selected for additional Pondcrete storage. This selection process included screening the area for the presence of pre-existing solid waste management units (SWMU's) by reviewing Appendix I of the November 1986 RCRA Part B Permit Application. This area was free of pre-

PAD 904 INTERIM STATUS CLOSURE PLAN

existing SWMU units. In the late summer of 1987, construction of Pad 904 began and waste was first received in September of 1987. The wastes stored on the Pad were described in the December 15, 1987 Revision 1 to the RCRA Part B Permit Application and consisted of the mixed low-level radioactive and hazardous wastes Pondcrete and Saltcrete. Saltcrete is a mixture of a forced evaporator salts and concrete. The majority of waste stored on the Pad has been Pondcrete.

Waste was first stored on the Pad for more than 90 days in December 1987 and waste is presently being stored. Accumulation of Pondcrete on Pad 904 temporarily ceased in May 1988 in reaction to a spill on the Pad. It is currently anticipated that no further accumulation of Pondcrete on Pad 904 will occur. Shipment of all Pondcrete on Pad 904 and cleanout of all Solar Evaporation Ponds is expected to be complete by October 1991 as stated in the "Agreement in Principle" signed by the DOE and CDH on June 28, 1989. These wastes will be disposed offsite at the Nevada Test Site (NTS), an approved RCRA facility.

2.2.2 Maximum Waste Inventory

The maximum Pondcrete and Saltcrete storage capacity of Pad 904 Area A is 6,136 triwall and 102 metal boxes of waste, accounting for approximately 103,464 cubic feet of waste (10,346,400 pounds, assuming a density of 100 pounds per cubic foot).

PAD 904 INTERIM STATUS CLOSURE PLAN

The current quantities of waste stored on Pad 904 Area A, as of September 1989, are as follows:

	Quantity	Volume cubic feet
Pondcrete, Triwall Boxes (15 cubic feet each)	4,491	67,365
Pondcrete 4ft x 4ft x 7ft Metal Boxes	102	11,424
Saltcrete Triwall Boxes (15 cubic feet each)	1,645	<u>24,675</u> 103,464

The current quantities of waste stored on Pad 904 Area B, as of September 1989, are as follows:

	Quantity	Volume cubic fee	t
Roaster Oxide Drums Composite Chips (ft x 4ft x 7ft metal Boxes)	353 23	4,3 2,5	
Composite Chips (2ft x 4ft x 7ft plywood Boxe	ı s)	!	56
Sanitary Sludge (2ft x 4ft x 7ft Metal Boxes)	313	8,7	00
Cemented Sludge Half Box	1	:	30
Drilling Soil (4ft x 4ft x 7 ft Metal Boxes	1	1	12
S & W Soil (4ft x 4ft x 7 ft Metal Boxes	2	2.	24
Miscellaneous Materials (2ft x 4 ft x 7ft Plywood Box	9 (es)	5	04
Miscellaneous Materials (4ft x 4ft x 7ft Metal Boxes)	3	3 16,8	<u>36</u> 46
PAD 904 INTERIM STATUS CLOSURE PLAN		REVISION DATE 9	0 /30/89

These wastes total 16,846 cubic feet of other wastes for a total of 1,684,600 pounds of waste stored in Area B, assuming a density of 100 pounds per cubic foot.

All future production of Pondcrete is anticipated to be shipped offsite without a storage period. Therefore, no more than the current inventory of Pondcrete is expected to be present on the Pad.

2.2.3 Types of Waste Managed

Pad 904 is used to store sanitary wastewater treatment plant (Building 995) sludge, and miscellaneous materials which are stored in cargo containers in Area B in addition to Pondcrete and Saltcrete which is stored directly on the Pad in Area A. This closure plan addresses only the mixed low-level radioactive and hazardous solid waste stored on the Pad in Area A. Low-level mixed wastes are defined as radioactive wastes with transuranic activity of less than 100 nanocuries per gram mixed with hazardous wastes. Transuranic compounds are those compounds with atomic number greater than uranium.

Table 1 identifies the EPA Hazardous Waste Numbers associated with Pondcrete in the RCRA Part A Permit Application. The maximum concentrations of any hazardous constituents and radionuclides identified in laboratory analyses are also presented. The analyses whose results are presented were conducted on both cured (hardened)

PAD 904 INTERIM STATUS CLOSURE PLAN

TABLE 1 PONDCRETE HAZARDOUS WASTE NUMBERS, MAXIMUM CONCENTRATIONS OF HAZARDOUS CONSTITUENTS AND RADIONUCLIDES

Maximum Concentration Identified	8.2 Milligrams per Liter (mg/l) of Cyanide contained in Pondcrete, Pondcrete Never Found to be Reactive Based on Evolution of Gas or Other Definitions of Reactivity.	Pondcrete Never Found to be EP Toxic	Detailed Below by Individual Compound 0.073 milligrams per kilogram (mg/kg) 0.035 mg/kg	No Identification of Spent Non- Halogenated Solvents 0.180 mg/kg	No Identification of Chlorinated Alıphatic Hydrocarbons ın Pondcrete	0.180 Milligrams per Kilogram (mg/kg)	0.035 mg/kg	0.160 mg/kg
Description	Reactivity	Extraction Procedure (EP) Toxicity for Barium, Chromium, Lead, and Silver	Spent Halogenated Solvents (SHS) Tetrachloroethylene (Perchloroethylene) Methylene Chloride (Dichloromethane)	Spent Non-Halogenated Solvents Acetone	Production Waste of Chlorinated Aliphatic Hydrocarbons	Acetone	Methylene Chloride	1,1,2,2-Tetrachloroethane
EPA Waste Number From Part A	D003	D005, D007, D008, D011	F001, F002	F003	F024	U002	0800	U209
EPA	0	0	0	0	0	0	0	0

TABLE 1
PONDCRETE HAZARDOUS WASTE NUMBERS,
MAXIMUM CONCENTRATIONS OF HAZARDOUS CONSTITUENTS
AND RADIONUCLIDES
(Continued)

EPA Waste Number From Part A	Description	Maximum Concentration Identified
*	Methyl Ethyl Ketone	0.023 mg/kg
*	Bis(2-ethylhexyl)-phthalate	0.152 mg/kg
Radionuclides**	Description	Maximum Identified Activity
	Plutonium-239	1800 ± 100 pC1/g
	Americium-241	1600 ± 100 pCi/g
	Uranium-233,234	60 ± 11 pci/g
	Uranium-238	66 ± 12 pC1/g

* Not listed in the Part A

Radionuclides are not considered hazardous constituents nor hazardous waste under RCRA. *

and uncured Pondcrete in 1986, 1987 and 1988. Based on the information presented in Table 1, many of the Hazardous Waste Number listings for Pondcrete in the RCRA Part A Permit are erroneous. The waste either does not have all of the characteristics identified, or it has not been found to contain the compound associated with the Hazardous Waste Number.

Table 2 identifies the EPA Hazardous Waste Numbers associated with Saltcrete in the RCRA Part A Permit Application. The maximum concentrations of any hazardous constituents identified in laboratory analyses are also presented. The results presented in Table 2 are for analyses conducted on Saltcrete in 1986 and 1988. Based on the information presented in Table 2, many of the Hazardous Waste Number listings for Saltcrete in the RCRA Part A Permit are erroneous. The waste either does not have all of the characteristics identified, or it has not been found to contain the compound associated with the Hazardous Waste Number. Saltcrete is not subject to the land-ban requirements as identified by Toxicity Characteristic Leaching Procedure (TCLP) tests.

2.2.4 Waste Process Description

Production process descriptions for Pondcrete and Saltcrete can be found in Section D of the RCRA Part B Permit. These are attached as Appendix A. A brief summary of these descriptions is given. Pondcrete is a solid material resulting from combining Solar Pond sludge or sediment with Portland Cement. The production of Pondcrete occurs near the Solar Ponds adjacent to Building 788. This material was mixed and placed in tri-wall fiberboard boxes, lined with 0.011 inch thick plastic. Each box contains approximately 15 cubic feet of processed waste. The boxes were banded to pallets for structural integrity and ease of

PAD 904 INTERIM STATUS CLOSURE PLAN

TABLE 2 SALTCRETE HAZARDOUS WASTE NUMBERS AND MAXIMUM CONCENTRATIONS OF HAZARDOUS CONSTITUENTS AND RADIONUCLIDES

EP	EPA Waste Number From Part A	Number art A	Description	Maximum Concentration Identified
0	D002		Corrosivity	Saltcrete Never Found to be Corrosive
o	D003		Reactivity	0.97 Milligrams per Kilogram (mg/kg) of Cyanide, 13 mg/kg of Sulfide, Saltcrete Never Found to be Reactive Based on Evolution of Gas or Other Definitions of Reactivity
0	D005, D008,	D007, D011	EP Toxicity for Barıum, Chromium, Lead, and Silver	Saltcrete Never Found to be EP Toxic
0	F001,	F002	Spent Halogenated Solvents (SHS) Methylene Chloride	Detailed Below by Individual Compound 0.080 mg/kg
0	F003		Spent Non-Halogenated Solvents Acetone	Detailed Below 0.380 mg/kg
0	F004		Spent Non-Halogenated Solvents	Never Detected Listed Spent Non- Halogenated Solvents
0	F005		Spent Non-Halogenated Solvents Methyl ethyl Ketone Toluene	Detailed Below 0.070 mg/kg 0.026 mg/kg
0	F024		Production Waste of Chlorinated Aliphatic Hydrocarbons	No Identification of Chlorinated Aliphatic Hydrocarbons in Waste
0	0002		Acetone	0.380 mg/kg
0	U044		Chloroform	Not Detected

TABLE 2
PONDCRETE HAZARDOUS WASTE NUMBERS AND
MAXIMUM CONCENTRATIONS OF HAZARDOUS CONSTITUENTS
AND RADIONUCLIDES
(Continued)

EPA Waste Number From Part A	Description	Maximum Concentration Identified
0 0080	Methyene Chloride	0.020 mg/kg
o U109	1,2-Diphenylhydrazine	Not Detected
o U159	Methyl Ethyl Ketone	0.070 mg/kg
o U220	Toluene	0.026 mg/kg
*	Benzene	0.026 mg/kg
Radionuclides**	Description	Maximum Identified Activity
	Plutonium-239	160 ± 10 pci/g
	Americium-241	88 ± 4 pci/g
	Uranium-233,234	25 ± 10 pci/g
	Uranium-238	88 ± 18 pci/g

Not listed in the Part A

Radionuclides are not considered hazardous constituents nor hazardous waste under RCRA. *

transportation. The boxes are transported into Building 788 to allow the Pondcrete to harden. Once the material has hardened the Pondcrete is transported to Pad 750 or 904 to await offsite disposal. Currently Pondcrete is placed in four foot by two and one half foot by seven foot polyethylene lined 3/4-inch thick plywood boxes following a process similar to that described above.

Saltcrete is a material similar in nature and manufacture to Pondcrete. Saltcrete is manufactured in Building 374 from salts which remain as a result of the evaporation of liquid process waste. This material was also placed in tri-wall fiberboard boxes, lined with 0.011 inch thick plastic, and allowed to harden. Once the material has hardened the Saltcrete is transported to Pad 750 or 904 to await offsite disposal. Currently Saltcrete is placed in four foot by two and one half foot by seven foot polyethylene lined 3/4-inch thick plywood boxes following a procedure similar to that described above.

Prior to May 23, 1988, all Pondcrete waste on Pad 904 was stored in groups of 72 boxes each. Boxes of waste were stacked three high in each group, and each group of 72 boxes was covered with tarpaulins of 100% polyester basecoat weave. These tarpaulins met military specification MIL-C-44-103 with a projected lifetime of three years. These tarpaulins were intended to provide protection from the weather.

On May 23, 1988, a spill of Pondcrete occurred at Pad 904. The existence of unhardened Pondcrete in the waste boxes led to the deformation of several boxes. The deformed boxes caused the stacks to become unstable and required that some waste be unstacked to prevent possible spills and other accidents.

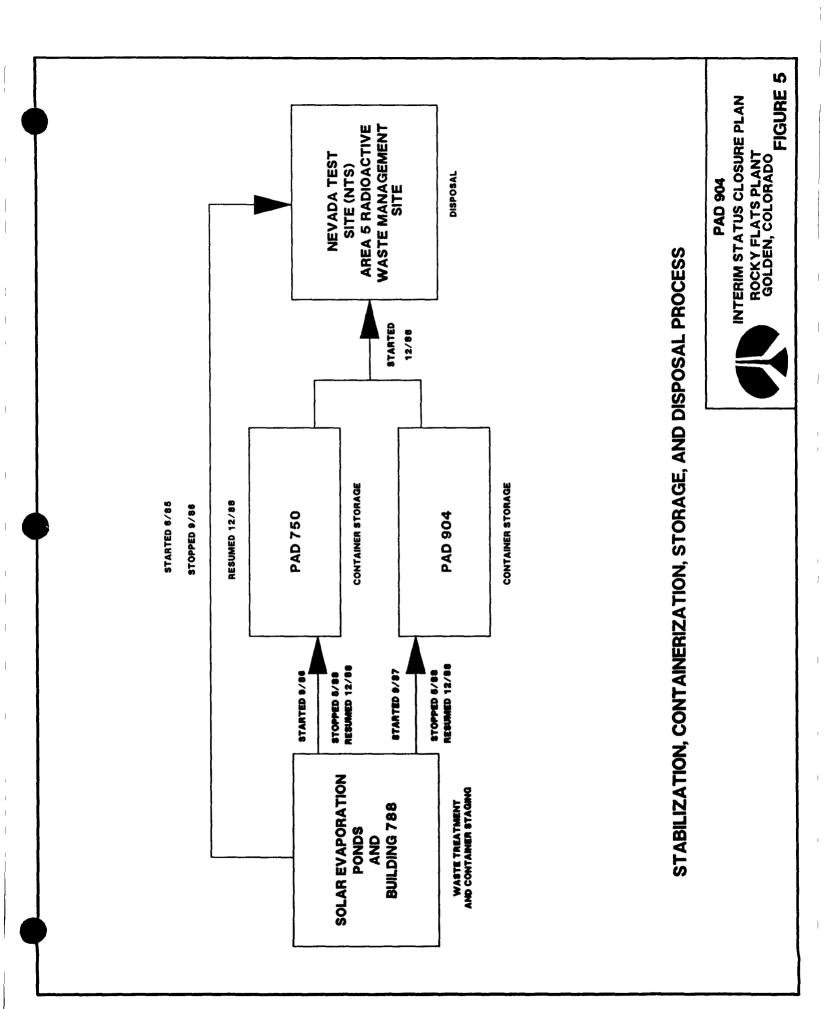
PAD 904 INTERIM STATUS CLOSURE PLAN

Activities related to unstacking the Pondcrete boxes began shortly after identification of the problem of box deformation. While unstacking the boxes, one box fell off the forklift onto the asphalt of Pad 904. The plastic liner failed from the impact of the fall, and approximately 0.25 cubic feet of Pondcrete spilled onto the asphalt of Pad 904. Response to this spill required the implementation of the RCRA Contingency Plan, and was therefore reported to CDH and EPA in the RCRA Contingency Plan Implementation Report No. 88-001. This spill was followed by other, similar spills at Pad 904.

Investigations related to the above spills identified inadequate quality control and inadequate inspection in the production of Pondcrete and subsequent destabilization of the waste form. Production of Pondcrete ceased on May 23, 1988, pending resolution of the problems, and more detailed inspections of the wastes stored on Pad 750 followed. These inspections identified approximately 25 percent of the Pondcrete boxes on Pad 904 to be of poor quality (ie, containing unhardened Pondcrete in at least a portion of the volume). Severely deformed boxes of waste were transferred into four foot by four foot by seven foot metal boxes or to Building 788 to await reprocessing.

Figure 5 presents the waste handling, treatment, storage and disposal process of the Pondcrete during the last four years. Between June 1986 and September 1986, Pondcrete produced as a result of the closure activities at the Solar Evaporation Ponds was shipped directly to the Nevada Test Site (NTS). In September of 1986 Pondcrete was identified as a mixed waste. NTS was not permitted as a low-level mixed waste disposal facility so Pondcrete shipments ceased. Pondcrete produced had to be stored on-site awaiting a final resolution to the problem of disposal.

PAD 904 INTERIM STATUS CLOSURE PLAN



The original on-site storage area for Pondcrete was Pad 750. During the spring of 1987 storage of Pondcrete at the existing storage area (Pad 750) was approaching capacity and the Pad 904 location was selected for additional Pondcrete storage.

As of September 1989, the proposed weekly shipment schedule for Pondcrete from the Plant to the NTS is as follows:

- o 48 plywood boxes from the Pads,
- o 30 plywood boxes from the reprocessing area, and
- o 34 plywood boxes directly from the processing area.
- 2.2.5 Monitoring and Containment Systems

Monitoring of Pad 904 has consisted of a combination of weekly inspections and regular monitoring of various media. Weekly inspections consist of walking aisles of the Pad and looking for leaking boxes, missing tarpaulins or other obvious problems with the Pondcrete storage. Any problems noted, such as missing tarpaulins, are corrected. Monitoring of the various media which may be impacted by operations at the Pad are discussed in detail below.

2.2.5.1 Air monitoring and containment

Air Monitoring

Ambient air samplers are located on the Rocky Flats plantsite, at the Plant perimeter (at a distance of approximately two to four miles from the Plant's center), and in surrounding communities.

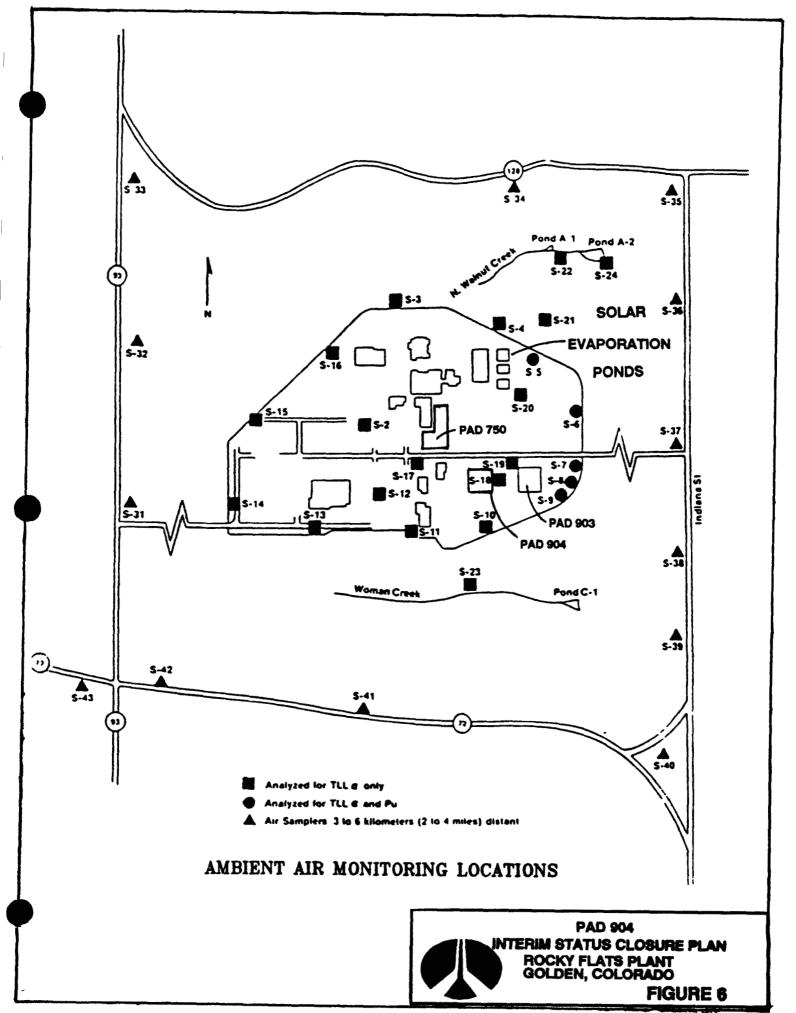
PAD 904 INTERIM STATUS CLOSURE PLAN

This monitoring program is known as the Radioactive Ambient Air Monitoring Program (RAAMP). This section addresses the RAAMP samplers located on the plantsite (Figure 6), as well as High-Volume (Hi-Vol) portable air samplers. Of particular interest are the samplers located near Pad 904, designated S-7, S-8, S-9, S-10, S-12, S-17, S-18 and S-19. The samplers designated S-7, S-8 and S-9 are located in the predominant downwind direction of Pads 903 and 904; the samplers designated S-10, S-18 and S-19 are located in the predominant downwind direction of Pad 904 and in the predominant upwind direction of Pad 903; and, the samplers designated S-12 and S-17 are located in the predominant upwind direction of Pads 903 and 904.

The RAAMP samplers operate continuously at an approximate volumetric flow rate of 25-35 cubic feet per minute (ft3/min) collecting air borne particles on a eight-inch by ten-inch fiberglass media. Manufacturer's test specifications rate this filter media to be 99.42 percent efficient for collection of particulates in the 0.01 to 1.0 micron range, as characterized by the median aerodynamic diameter (Wedding and Carney, 1978; Wedding et al, 1984; and Schleicher and Schuell, Inc. 1982). The maximum sized particles these have been found to collect is approximately 30 microns in diameter. This collection range and efficiency gives an excellent coverage of the total size range of respirable particles as discussed in applicable EPA publications (EPA, 1982 and 1985).

All RAAMP sample filters are collected biweekly and analyzed for total long-lived alpha (TLL Alpha) activity. If the TLL Alpha activity for a filter exceeds the Plant Screening Guide of .01 picocuries per cubic meter (pCi/m3) a specific plutonium analysis is performed. The Plant Screening Guide is more conservative than

PAD 904 INTERIM STATUS CLOSURE PLAN



the DOE Derived Concentration Guide of .02 pCi/m3 for plutonium inhalation by members of the public. Of the air sampler locations listed above, sampling sites S-7, S-8 and S-9 are routinely analyzed for both TLL Alpha and plutonium.

In addition to the RAAMP monitoring in the vicinity of Pad 904, Hi-Vol portable air samplers have been employed at Pad 904. Within a few hours following the May 23, 1988 Pondcrete spill incident two Hi-Vol portable air samplers were moved to the Pad. One sampler was located in the center of the Pad and the second sampler was located on the eastern edge of the Pad, in the predominant downwind direction. These samplers were operated continuously on Pad 904 until approximately April 1989. The filters from these air samplers were analyzed for both TLL alpha and plutonium. Analytical results available as of April 1989 indicated that concentrations of plutonium were found to be below the Rocky Flats Plant screening level of 0.01 pCi/m3 at both the RAAMP and Hi-Vol portable samplers operated near Pad 904.

Air Containment

The RCRA Contingency Plan was implemented to abate any potential airborne transport related to Pondcrete spills. Generally this plan involved transferring the contents of the failed container and the spilled Pondcrete into a four foot by four foot by seven foot metal container and transferring this container to an indoor area or another location on the Pad for temporary holding while awaiting reprocessing. The location of the Pad where the Pondcrete had spilled was then cleaned by washing with water using brooms to remove Pondcrete from crevices in the asphalt. Wash water was collected using a wet vacuum cleaner. This liquid was then

PAD 904 INTERIM STATUS CLOSURE PLAN

transferred to the Pondcrete processing area for reprocessing into Pondcrete.

2.2.5.2 Surface water monitoring and containment

Surface Water Containment

Pad 904 construction is described in Section 2.1. The Pad originally consisted of only asphalt with no runoff containment berms. Berms were constructed on the west, north and east sides of Pad on June 6, 1988, following a spill of Pondcrete (Figures 3 and 4). The height of the berm is six inches. The purpose of the berm is that of collecting storm runoff rather than spill containment. The berm was constructed of hot bituminous pavement and as such is not completely impermeable to water. The berms are believed to be inadequately sealed to the Pad to prevent water from flowing under the berms and off the Pad. The Pad surface and inside the berm is approximately 107,600 square feet (ft²), while the Pad area outside the berm is about 19,200 ft². All Pondcrete is stored within the bermed area (Area A).

As shown on Figure 4, the Pad surface slopes to the north and east at 0.7 percent respectively. Because of this slope, water tends to accumulate along the north berm and in the northeast corner of the Pad adjacent to the berm.

The six-inch high berm could store approximately 5120 cubic feet (ft³) of water uniformly distributed along the north berm. This volume of runoff translates to a storm of about 1.0 inches at a CN of 95 and average initial abstractions. The average annual recurrence interval 24-hour storm for this 1.0-inch rainfall is less than 2 years (DRCOG, 1969), and most likely would occur on the

PAD 904 INTERIM STATUS CLOSURE PLAN

average at least once every year. Therefore, the 6-inch high berm along the west, north and east sides of Pad 904 may not be effective in retaining even moderate storm events.

In order to minimize runoff overtopping the berms, a mobile tank with pumping equipment to collect ponded water from the Pad was moved to the Pad. The mobile and associated pumping equipment was added to the RCRA Part B Permit Application for Low-Level and Mixed Waste as a 90-day storage area. The water which is collected is transported to the forced evaporator in Building 374 for treatment or to the Tank 231 Tank complex for storage prior to evaporation in Building 374.

Surface Water Monitoring

Sampling of runoff water from Pad 904 began on February 12, 1988. Grab samples were collected where runoff exited the Pad at its northeast corner until after June 6, 1988 when samples were also collected from water ponded behind the newly constructed berm. The water samples were routinely analyzed for gross alpha, gross beta, nitrate-nitrogen and dissolved solids concentrations. One sediment sample that had been contaminated by runoff from a Pondcrete spill (July 22, 1988) was also collected and analyzed for gross alpha and gross beta activity. Specific isotopes (plutonium, americium and uranium) have occasionally been analyzed in water samples. Detailed discussions of the results of these analyses are presented in Section 2.2.6.3.

PAD 904 Interim Status Closure Plan

2.2.5.3 Soil monitoring and containment

Soil Monitoring

April 7, 1987 Soil Sampling

Because Pad 904 is located adjacent to Pad 903, the largest source of plutonium release to the environment at the Rocky Flats Plant (Rockwell, 1987), soil samples were collected prior to the construction of Pad 904 to assess the pre-existing concentrations of plutonium-239. Four soil samples were collected from a 125,000 square foot (ft^2) area on April 7, 1987 (Figure 7). The samples were taken from the "undisturbed" soils to a total depth of approximately two inches in the area where Pad 904 was to be constructed. Samples were collected using the Rocky Flats sampling tool which extracts a sample 10 cm x 10 cm on a side and five cm deep.

Plutonium-239 concentrations for the four samples collected on April 7, 1987 ranged from 0.03 pCi/gm to 4.2 pCi/gm (Table 3). These concentrations are generally above fallout levels (0.2 pCi/gm) (USEPA 1986) and indicate some plutonium contamination was present at the Pad 904 location prior to construction of the Pad. While only limited data are available for soil in the Pad 904 area, it appears that plutonium concentrations increase toward the east, in the direction of Pad 903, which is the probable source for the elevated plutonium-239 concentrations in soil (Figure 7).

August and September, 1987 Soil Sampling

Soil at Pad 904 was resampled in August and September, 1987 when the Pad was under construction. As a result of Pad construction,

PAD 904 INTERIM STATUS CLOSURE PLAN

PAD 904 INTERIM STATUS CLOSURE PLAN

TABLE 3

SUMMARY OF SOIL CHEMICAL DATA AT AND MEAR 904 PONDCRETE STORAGE AREA

	SAMPLE							
SAMPLE DATE	DESIGNATION 1) Am-241	1) Am-241	Pu-239	Pu (Total)	U (Total) U-234	U-234	U-238	NO3-N
		(pC1/gm)	(bC1/8m)	(bC1/gm)		(pc1/gm)	(bC1/gm)	
	87-903NW							
April 7, 1987	87-903NE	2)	0 03	:	:	;	:	;
•	87-903SW	:	8 -	:	;	:	:	;
	87-903SE	:	0 12	:	:	:	:	;
		:	4 2	:	:	:	:	;
	W-903-1							
Aug./Sept. 1987 W-903-1	W-903-1	:	9 15+/-0 88	:	:	:	:	:
•	₩-903-2	:	8 09+/-0.66	:	:	:	:	:
	H-903-2	:	Data Not Valid	:	:	:	:	;
	W-903-3	:	18 82+/-1 75	:	:	:	:	:
	W-903-3	;	13.95+/-1 22	:	:	:	:	;
	N-903-4	:	16 93+/-1.51	:	:	:	:	;
	N-903-4	;	67 16+/-8 08	:	:	:	:	;
		•	66 62+/-5.38	:	:	:	:	;
	-							
May 26, 1988	~	:	0.24+/-0 0028	;	:	0.95+/-0 10	0 98+/-0 10	7
•	m	:	2.28+/-0.22	;	:	1 12+/-0 12	1 08+/-0.12	850
	*	:	:	:	:	;	:	7
	.	:	:	:	:	;	:	14
	•	;	0.23+/0.022	:	;	0 72+/-0.08	20 0-/+29 0	∞
		•	0.26+/-0.026	:	:	1.11+/-0.18	1.01+/-0 11	140
October 24. 1988	-	0 14+/-0.01	33	3 7+/-0 2	2 3	;	;	;
	. ~	1.49+/-0.08	:	2 8+/-0 2	0	:	:	;
	m	23.94/-1.03	:	0 3+/-0 1	5.4	:	:	:
	•	3 63+/-0.15	:	0 2+/-0 1	2 7	:	:	:
	·w	0 23+/-0.01	:	16+/-1	3.7	:	:	;
	•	0 35+/-0.02	•	34+/-1	3.1	:	:	;
	~	:	:	4 0+/-0.2	3 4	:	:	;
	••	:	:	3 3+/-0.1	0 7	:	:	:
	Reagent Blani	Reagent Blank 0.23+/-0.03	:	:	:	:	:	;

¹⁾ Estimated Sample Locations Shown on Figure

^{2) --} No Analyses For Indicated Variable

³⁾ Counting Error (+/-) at 95% Conflence Interval Shown When Reported By Laboratory

the vegetation and top six to 12 inches of soil in the Pad 904 area were removed. Samples were then collected from eight sites (Figure 8). The samples were collected using the Rocky Flats sampling tool Field notes recorded at the time of sampling described above. reported that the soil material was extremely rocky, and recovery from the tool for each sample was low. Also, the soil was wet as a result of a rainfall event which had occurred the previous night. samples were analyzed for plutonium-239 concentrations. Plutonium-239 concentrations for the eight soil samples collected in August and September, 1987 ranged from about 8 to over 67 pCi/gm (Table 3). The areal distribution of plutonium-239 concentrations in these samples were similar to those of the samples collected on April 7, 1987, with concentrations increasing in the direction of Pad 903 (Figure 8). However, the plutonium-239 concentrations found in soil collected in August and September 1987 were more than an order of magnitude higher than the plutonium-239 concentrations found in soil collected on April 7, 1987.

The results of sampling activities in April 7, 1987, and in August and September 1987, seem to indicate that relatively clean soil materials had been laid down over already contaminated soil materials in the area of Pad 904. Covering plutonium-contaminated soils with clean soils was a practice at the Rocky Flats Plant during the late 1960's and early 1970's. This practice was instituted to minimize the resuspension and off-site transport of plutonium contaminated soil particles. Also, during that time period, intense activities were underway near Pad 903, with drums containing plutonium being reprocessed and repackaged.

PAD 904 INTERIM STATUS CLOSURE PLAN

Figure 8

PAD 904 INTERIM STATUS CLOSURE PLAN

May 26, 1988 Soil Sampling

In response to a May 23, 1988 Pondcrete spill on Pad 904, six soil samples were collected on May 26, 1988 from four sites immediately adjacent to the eastern and northern edges of Pad 904, and two sites chosen as "background" for purposes of analyzing for nitrate as nitrogen, plutonium-239 and uranium-234, 238 concentrations (Figures 9, 10, 11 and 12, respectively).

The four samples collected for evaluating contamination (Sites 1, 2, 5 and 6 presented on Figure 9 through 12) were collected from gravel shoulder of Pad 904 at a depth of approximately three-inches. These sampling sites were selected based on staining on the asphalt of Pad 904 which indicated an area where runoff had exited the as-yet unbermed Pad 904.

Analytical results of the soil samples collected on May 26, 1988 are presented in Table 3. Nitrate concentrations ranged from 7 mg/kg to 850 mg/kg with the highest concentrations found in soil associated with the center of the eastern and northern edges of the Pad (Figure 9). Plutonium-239 concentrations ranged from 0.23 +/-0.022 to 2.28 +/- 0.22 pCi/gm with the higher concentrations being found in soil associated with the center of the eastern edge of the Pad (Figure 10). Uranium-234 concentrations ranged from 0.72 +/-0.08 to 1.12 +/- 0.12 pCi/gm with higher concentrations found in soils associated with the center of the eastern and northern edges of the Pad (Figure 11). Uranium-238 concentrations ranged from 0.67 +/- 0.07 to 1.08 +/- 0.12 pCi/gm with a slight increase in concentrations similar to those found for nitrate concentrations (Figure 12).

PAD 904 INTERIM STATUS CLOSURE PLAN

FIgure 9

PAD 904 INTERIM STATUS CLOSURE PLAN

PAD 904 INTERIM STATUS CLOSURE PLAN

Figure 11

PAD 904 INTERIM STATUS CLOSURE PLAN

PAD 904 INTERIM STATUS CLOSURE PLAN

Soil sampling done on October 24, 1988 provides additional evidence that the native soil in the vicinity of Pad 904 was buried beneath a layer of debris and imported soils. This soil sampling was conducted west of Pad 904, with the eight soil sampling locations presented on Figures 13 through 15. Analyses were for americium-241, total plutonium and total uranium. The reason for this sampling was the possible construction of a new building related to Pondcrete operations immediately west of Pad 904. Up to six inches of overlying debris and soil were penetrated at the eight sampling sites prior to reaching the "original" ground surface. The original ground surface was sampled and submitted for analysis.

Analytical results related to the October 24, 1988 soil sampling are presented in Table 3. These results indicate that americium-241, total plutonium and total uranium concentrations in soil were present above fallout concentrations, most likely due to activities at Pad 903. Americium-241 concentrations were found to range from 0.14 +/- 0.01 to 23.9 +/- 1.03 pCi/gm (the reagent blank was found to have a concentration of 0.23 +/- 0.03 pCi/qm) with an increase in concentrations being evident away from the Pad in a westerly, upwind, direction (Figure 13). Total plutonium concentrations were found to range from 2.8 +/- 0.2 to 34 +/- 1 pCi/gm with an increase in concentrations found to be similar to americium-241 concentrations (Figure 14). Total uranium concentrations were found to range from 1.9 to 4 pCi/gm with a slight decrease in concentrations being evident away from the Pad in a northwesterly, upwind, direction (Figure 15).

PAD 904 INTERIM STATUS CLOSURE PLAN

Figure 13

PAD 904 INTERIM STATUS CLOSURE PLAN

PAD 904 INTERIM STATUS CLOSURE PLAN

PAD 904 INTERIM STATUS CLOSURE PLAN

Soil Containment

There have been no reported spills to soil in the Pad 904 area and as a result soil containment has not been necessary.

2.2.5.4 Groundwater monitoring and containment

Groundwater Monitoring

Although groundwater monitoring is not specifically required for container storage areas, groundwater monitoring of the Pad 904 Area is provided as part of on going Environmental Restoration Program. These programs are: Remedial Investigations (RI's) for CERCLA sites at the Hillside 881, Pad 903, Mound, and East Trenches; and various RCRA Closure activities.

Specifically, this section addresses the groundwater monitoring locations in the vicinity of Pad 904 (Figure 16). Of particular interest are the 14 monitoring wells located near Pad 904, wells; 23-86, 24-86, 25-86, 26-86, 33-86, 61-86, 4-87BR, 5-87BR, 9-87BR, 10-87BR, 15-87, 16-87BR, 44-87 and 45-87BR. Boring logs for these wells are presented in Appendix B.

The following sections present a geologic and hydrogeologic model of the Pad area.

2.2.5.4.1 Regional Alluvial Geology

The alluvial geology in the vicinity of Pad 904 consists mainly of Rocky Flats Alluvium and disturbed ground unconformably overlying bedrock. The Rocky Flats Alluvium is topographically the highest and oldest member of six alluvial deposits in the vicinity of the

PAD 904 INTERIM STATUS CLOSURE PLAN

Figure 16

PAD 904 INTERIM STATUS CLOSURE PLAN

plant (Figure 17). The Rocky Flats Alluvium occurs at elevations between 6,000 feet and 5,930 feet above sea level in the immediate area of Pad 904.

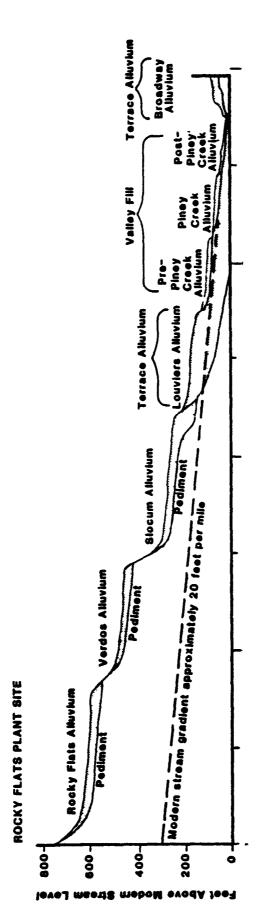
The Rocky Flats Alluvium is a Quaternary alluvial complex derived from the Colorado Front Range. It is comprised of poorly sorted cobbles, gravels, sands, silts and clays with some boulders, and is cemented in some areas by caliche (Rockwell, 1986). The thickness of the Rocky Flats Alluvium is variable due to deposition on an erosional surface and recent erosional processes. It is thickest west of the Plant where less has been eroded, and thinnest to the east of the Plant (Rockwell, 1988). The Rocky Flats Alluvium material has been partially removed by erosion and the resulting drainages repeatedly infill with more recent sediments.

Areas of disturbed ground caused by construction of roads, buildings, pads and other Plant activities is also found in the area of Pad 904. This disturbed ground is reworked Rocky Flats Alluvium in the Pad area and is generally described as unconsolidated clay, silt, sand, gravel and pebbles. The materials are very poorly sorted with fragments of claystone and cement rubble and display no bedding. (Rockwell, 1988).

2.2.5.4.2 Regional Bedrock Geology

Bedrock units underlying the Plant consist of the Arapahoe and Laramie Formations (Rockwell, 1988). Because of the thickness and low permeability of the upper Laramie, it is generally considered to be the base of the hydrogeologic system which could be affected by Plant operations (Rockwell 1988).

PAD 904 INTERIM STATUS CLOSURE PLAN



(after. Scott, 1960)

GENERALIZED GEOLOGIC CROSS SECTION



Arapahoe Formation

The Arapahoe Formation is a fluvial deposit that consists of claystones with interbedded lenticular sandstones and siltstone. Contacts between these lithologies are both sharp and gradational. The claystones are poorly indurated, silty, and contain up to 15 percent organic material. Weathering has penetrated as much as 40 feet into bedrock. The weathered claystone is light olive gray, blocky, slightly fractured, and has iron staining as mottles along bedding planes and fractures (Rockwell, 1986a).

Sandstones in the Arapahoe Formation are very fine to medium grained, with approximately 15 percent silt and clay. The sandstones are lenticular, discontinuous, and stratigraphically complex. The sand grains are subangular to subrounded and are predominantly quartzose with 10 percent lithic fragments. The sandstones are poorly to moderately cemented and exhibit ripple marks, load casts, and planar, angular, and trough crossbedding.

Arapahoe Formation siltstones exhibit the same coloration, constituents, bedding characteristics, and sedimentary structures as the sandstones (Rockwell, 1988).

The general bedrock geologic structure of the region is north striking sedimentary beds with dips to the east away from the Front Range Monocline. Dips are on the order of 3 to 7 degrees beneath the Plant.

There are believed to be no major faults cutting through the Arapahoe Formation in the vicinity of the plant. (Rockwell, 1986).

PAD 904 INTERIM STATUS CLOSURE PLAN

2.2.5.4.3 Site Alluvial Geology

The alignments of three cross-sections (A-A', B-B' and C-C') are presented on Figure 16. Appendix B presents the lithologic logs that were used to develop the three geologic cross-sections.

A north to south cross-section (A-A') through the area of Pad 904 indicates that approximately 10 to 20 feet of Rocky Flats Alluvium (Qrf) underly Pad 904 (Figure 18). The alluvium appears to be completely eroded approximately 150 and 900 feet north of Pad 904, where surface drainages exist. South of Pad 904 the Rocky Flats Alluvium attains a maximum thickness of approximately 40 feet and then rapidly reduces in thickness as it enters the north flank of the Woman Creek valley. Throughout the area which cross-section A-A' transects the Rocky Flats Alluvium is underlain by subcropping claystones (Ka) and isolated subcropping siltstones/sandstones (Kass) of the Arapahoe Formation.

An east to west cross-section (B-B') through the area of Pad 904 indicates that approximately 10 feet of Rocky Flats Alluvium (Qrf) underly the Pad (Figure 19). The alluvium appears to maintain a thickness of 10 to 20 feet. This alluvium appear to be underlain by claystones (Ka) and isolated subcropping siltstones/sandstones (Kass) of the Arapahoe Formation along the entire length of the cross-section.

A north to south cross-section (C-C') through the area of Pad 904 indicates that approximately 10 feet of Rocky Flats Alluvium (Qrf) underly the Pad (Figure 20). The alluvium appears to maintain a thickness of five to 15 feet with some reduction in thickness being noted along the southern end of the cross-section as the alluvium enters the north flank of the Woman Creek valley. Throughout the

PAD 904 INTERIM STATUS CLOSURE PLAN

area which cross-section C-C' transects the Rocky Flats Alluvium is underlain by claystones (Ka) of the Arapahoe Formation.

2.2.5.4.4 Site Bedrock Geology

A north to south cross-section (A-A') through the area of Pad 904 indicates that an approximately 100 foot thick sandstone/siltstone unit of the Arapahoe Formation is present as a subcrop at a depth of approximately 10 feet directly below Pad 904 (Figure 18). This unit appears to be dipping to the southeast at approximately six degrees.

An east to west cross-section (B-B') through the area of Pad 904 supports the existence of the 100 foot thick sandstone/siltstone unit of the Arapahoe Formation presented above (Figure 19).

A north to south cross-section (C-C') through the area of Pad 904 indicates that sandstone/siltstone unit of the Arapahoe Formation maybe present at a depth of approximately 85 feet below Pad 904 (Figure 20). Based on cross-section C-C', this unit is vertically separated from the Pad by approximately 10 feet of Rocky Flats Alluvium and 75 feet of Arapahoe claystone.

2.2.5.4.5 Site Alluvial Hydrogeology

The alluvial aquifer potentiometric surface slopes away from Pad 904 toward the north, east and south (Figure 21). Groundwater flow in the alluvial aquifer appears to be strongly influenced by topography and the configuration of the base of weathering in the Arapahoe Formation (Rockwell, 1989).

PAD 904 INTERIM STATUS CLOSURE PLAN

The alluvium potentiometric map was developed using groundwater monitoring data collected on April 4, 11 and 18, 1988. Appendix C presents hydrographs for alluvial wells which are located along the cross-sections A-A', B-B' and C-C'.

Groundwater elevation information for alluvial wells presented in Appendix C suggests that groundwater levels have remained relatively stable in wells 4-87, 10-87, 15-87, 26-86 and 61-86 (variance within one to six feet) and have dropped below the lowest screened interval during most of the period of record in wells 24-86 and 44-87 (variance of approximately one to two feet caused dry wells). Based on the contour interval of the alluvium potentiometric map of 10 feet the alluvial groundwater elevation variations with time should not significantly effect the general slope of the potentiometric surface presented on Figure 21.

Previous alluvial aquifer potentiometric maps for the first through fourth quarters of 1988 (Rockwell, 1989) indicated that alluvial aquifer flow directions and gradients remain fairly constant throughout the year. Therefore, the potentiometric surface presented on Figure 21 is thought to adequately represent alluvium hydrogeologic conditions near Pad 904. Areas of unsaturated surficial materials are present north of Pad 904 near wells 33-86 and 38-87. These unsaturated surficial materials may represent areas where bedrock is very near the surface and acts as a no flow boundary or where building footing drains dewater the local alluvial aquifer.

Based on the information presented on the alluvium potentiometric map and cross-sections A-A', B-B' and C-C' the following can be stated about groundwater monitoring in the Pad 904 area.

PAD 904 INTERIM STATUS CLOSURE PLAN

- o Groundwater flowing south from Pad 904 may be monitored using information collected from wells 10-87 and 44-87.
- o Groundwater flowing east from Pad 904 may be monitored using information collected from wells 10-87 and 15-87, and
- o Groundwater flowing north from Pad 904 will most likely be discharged to the headwaters of South Walnut Creek prior to being intercepted by well 33-86.

Analyses of the alluvium potentiometric data indicates that water in the alluvial aquifer in the vicinity of Pad 904 flows; toward the south and southeast at a rate of about 5.26×10^{-3} ft/day (based on a saturated hydraulic conductivity of 1.36×10^{-2} ft/day, an assumed effective porosity of 0.1, and a gradient of 0.039 ft/ft); and toward the northeast at a rate of about 2.72×10^{-3} ft/day (based on a saturate hydraulic conductivity of 1.36×10^{-2} ft/day, an assumed effective porosity of 0.1 and a gradient of 0.020 ft/ft).

Hydraulic conductivity estimates for the alluvial aquifer are based on slug test data (Rockwell, 1989).

2.2.5.4.6 Site Bedrock Hydrogeology

The bedrock aquifer potentiometric surface slopes away from Pad 904, roughly consistent with the dip of the sandstone/siltstone units of the Arapahoe Formation (Figure 22).

Groundwater elevation information for bedrock wells presented in Appendix C suggests that groundwater levels have remained

PAD 904 INTERIM STATUS CLOSURE PLAN

relatively stable in wells 5-87BR, 9-87BR and 45-87BR (variance within one to three feet), moderately stable in wells 16-87BR and 23-86BR (variance within 15 to 30 feet) and relatively unstable in well 25-86 (variance approximately 60 feet). Based on the contour interval of the bedrock potentiometric map of 20 feet these groundwater elevation variations with time should not significantly effect the general slope of the potentiometric surface presented on Figure 13. Previous alluvial aquifer potentiometric maps for the first through fourth quarters of 1988 (Rockwell, 1989) indicated that bedrock aquifer flow directions and gradients remain fairly constant throughout the year. Therefore, the potentiometric surface presented on Figure 22 is thought to adequately represent bedrock hydrogeologic conditions near Pad 904.

Based on the information presented on the bedrock potentiometric map and cross-sections A-A', B-B' and C-C' the following can be stated about groundwater monitoring in the area of Pad 904 may be made:

- o Groundwater flowing south from Pad 904 may be monitored using information collected from wells 9-87BR and 45-87BR,
- o Groundwater flowing east from Pad 904 may be monitored using information collected from wells 9-87BR and 16-87BR, and
- o Groundwater flowing north from Pad 904 may be monitored using information collected from wells 9-87BR and 22-87BR.

Analysis of bedrock aquifer potentiometric data indicates that groundwater in the bedrock aquifer, which is assumed to occur

PAD 904 INTERIM STATUS CLOSURE PLAN

predominately in the sandstone/siltstone units in the vicinity of Pad 904, flows toward the south at a rate of 1.92×10^{-3} ft/day under a gradient of 0.170 ft/ft; towards the east a rate of 1.15 \times 10^{-3} ft/day under a gradient of 0.102 ft/ft; and toward the northeast at a rate of 1.38 \times 1^{-3} ft/day under a gradient of 0.122 ft/ft. These ground water flow rates assume an effective porosity of 0.1 and a sandstone saturated hydraulic conductivity of 1.13 \times 10^{-3} ft/day. The hydraulic conductivity values used are based on slug and packer test data (Rockwell, 1989).

GROUNDWATER SAMPLING

Quarterly sampling of monitoring wells at the Plant is initiated immediately upon their completion and development. Water levels are measured monthly as well as at the time of sampling. As was stated above some surficial saturated zone wells are dry upon inspection for quarterly sampling, and as a result no sample is collected.

When water is present and samples are collected, analyses are for the parameters listed in Table 4. During 1986 groundwater samples were analyzed for the Hazardous Substance List (HSL) volatiles, HSL semi-volatiles, and metals as well as major ions and radionuclides.

In 1987 and 1988 analyses were performed by an on-site Rockwell International laboratory. During the first three quarters of 1987, the volatile organic analyte list was reduced to the nine volatile compounds previously detected in groundwater at the Plant. During the fourth quarter of 1987, the Rockwell laboratory obtained a gas chromatograph/mass spectrometer and began analyzing for the full HSL volatile organic compound list. When there is insufficient

PAD 904 INTERIM STATUS CLOSURE PLAN

water available to analyze the entire suite of parameters samples are collected and analyzed in the following order:

- o Volatile Organic Compounds;
- o Plutonium, Uranium, and Americium;
- o Nitrate;
- o Metals;
- o Other Major Ions; and
- o Other Radionuclides.

Currently, groundwater monitoring is conducted for the parameters listed in Table 4.

TABLE 4 GROUNDWATER SAMPLING PARAMETERS

FIELD PARAMETERS

pН

Specific Conductance

Temperature

INDICATORS

Total Dissolved Solids

METALS

Hazardous Substance List - Metals

Aluminum
Antimony
Arsenic
Barium
Beryllium
Cadmium
Calcium
Chromium
Cobalt
Copper

Copper Iron Lead

Magnesium
Manganese
Mercury
Nickel
Potassium
Selenium
Silver
Sodium

Thallium Vanadium

Zinc

Cesium

Chromium (hexavalent)

Lithium Molybdenum Strontium

ANIONS

Carbonate
Bicarbonate
Chloride
Sulfate
Nitrate
Cyanide

PAD 904 INTERIM STATUS CLOSURE PLAN

TABLE 4 (con't) GROUNDWATER SAMPLING PARAMETERS

ORGANICS

Hazardous Substance List - Volatiles: Chloromethane Bromomethane Vinyl Chloride Chloroethane Methylene Chloride Acetone Carbon Disulfide 1,1-Dichloroethene 1,1-Dichloroethane trans-1,2-Dichloroethane Chloroform 1,2-Dichloroethane 2-Butanone 1,1,1-Trichloroethane Carbon Tetrachloride Vinyl Acetate Bromodichloromethane 1,1,2,2-Tetracholoroethane 1,2-Dichloropropane trans-1,3-Dichloropropene Trichloroethene Dibromochloromethane 1,1,2-Trichloroethane Benzene cis-1,3-Dichloropropene 3-Chloroethyl Vinyl Ether Bromoform 2-Hexanone 4-Methyl-2-pentanone Tetrachloroethene Toluene Ethyl Benzene Styrene Total Xylenes

Oil and Grease

Hazardous Substance List - Semi-Volatiles:
2,4,6-Trichlorophenol
2,4,5-Trichlorophenol
2-Chloronaphthalene
2-Nitroaniline
Dimethyl Phthalate
Acenaphthylene
2,4-Dinitrophenol

PAD 904 INTERIM STATUS CLOSURE PLAN

TABLE 4 (con't) GROUNDWATER SAMPLING PARAMETERS

4-Nitrophenol Dibenzofuran 2,4-Dinitrotoluene 2,6-Dinitrotoluene Diethyl Phthalate 4-Chlorophenyl-phenylether Fluorene 4-Nitroaniline 4,6-Dinitro-2-methylphenol N-Nitrosodiphenylamine 4-Bromophenyl-phenylether Hexachlorobenzene Pentachlorophenol Phenanthrene Anthracene di-n-Butyl Phthalate Fluoranthene Pvrene Butyl Benzyl Phthalate 3,3'-Dichlorobenzidine Benzo(a) Anthracene bis(2-ethylhexyl)Phthalate Chrysene di-n-Octyl Phthalate Benzo(b) Fluoranthene Benzo(k) Fluoranthene Benzo(a) Pyrene Indeno(1,2,3-cd)Pyrene Dibenz(a,h)Anthracene Benzo(g,h,i)Perylene bis(2-Chloroethyl)Ether 2-Chlorophenol 1.3-Dichlorobenzene 1,4-Dichlorobenzene Benzyl Alcohol 1,2-Dichlorobenzene 2-Methylphenol bis(2-Chloroisopropyl)Ether 4-Methylphenol N-Nitroso-di-n-propylamine Hexachloroethane Nitrobenzene Isophorone 2-Nitrophenol 2,4-Dimethylphenol

PAD 904 INTERIM STATUS CLOSURE PLAN

TABLE 4 (con't) GROUNDWATER SAMPLING PARAMETERS

Benzoic Acid bis(2-Chloroethoxy)Methane 2,4-Dimethylphenol

1,2,4-Trichlorobenzene
Naphthalene
4-Chloro-3-methylphenol
2-Methylnaphthalene
Hexachlorocyclopentadiene

Hazardous Substance List - Pesticides and PCBS

Alpha-BHC Beta-BHC Delta-BHC Gamma-BHC

Gamma-BHC (Lindane)

Heptachlor Aldrin

Heptachlor Epoxide

Endosulfan I Dieldrin 4,4'-DDE Endrin

Endosulfan II

4,4'-DDD

Endosulfan Sulfate

4,4'-DDT
Methoxychlor
Chlordane
Toxaphene
Arochlor-1016
Arochlor-1221
Arochlor-1232
Arochlor-1242

Arochlor-1248 Arochlor-1254

RADIONUCLIDES

Gross Alpha
Gross Beta
Uranium 233+234, 235, and 238
Americium 241
Plutonium 239+240
Strontium 90
Cesium 137
Tritium

PAD 904 INTERIM STATUS CLOSURE PLAN

2.2.6 Releases

Spills of Pondcrete and Saltcrete have occurred at Pad 904. first spill of Pondcrete occurred on May 23, 1988, was followed by spills on July 22, 1988 and September 19, 1988. The first spill of Saltcrete occurred during the period from June 26 through July 16, 1989 and was followed by a second spill which occurred during the period from July 17 through August 25, 1989. The spills did not represent Reportable Quantities (RQ's) as required by the CERCLA spill reporting requirements in that there were no releases to the environment since the spills were onto the asphalt of Pad However, the occurrence of spills have been reported in the RCRA Contingency Plan Implementation Reports or in Monthly Reports on Pondcrete operations submitted to the cognizant regulatory agencies. All spills were cleaned up immediately identification. The following section presents highlights of these reports. Appendix D presents RCRA Contingency Plan Implementation Reports and Monthly Pondcrete Operations status reports.

2.2.6.1 Releases to the Pad

Pondcrete

May 23, 1988 Spill

The incident was discovered at approximately 5:10 a.m. on Monday, May 23, 1988 by a foreman at the Plant, who noticed deformed boxes of Pondcrete on Pad 904. The operators of the Pad were dispatched by the foreman and confirmed the presence of deformed boxes of Pondcrete at approximately 9:00 a.m. The foreman immediately notified the Plant Shift Superintendent (RCRA Emergency Director), the Plant Radiation Monitoring group and the Plant Fire Department.

PAD 904 INTERIM STATUS CLOSURE PLAN

Activities related to unstacking the Pondcrete boxes began immediately in an effort to prevent any of the stacked boxes from toppling over and causing a spill (the boxes of waste are stacked three high). While unstacking the boxes with a forklift one box fell off the forklift onto the asphalt of Pad 904. The plastic liner of the triple walled Pondcrete box failed on impact and approximately 0.25 cubic feet (ft3) of Pondcrete was spilled onto the asphalt Pad. This 0.25 ft3 release of Pondcrete distributed itself across approximately a two square foot (ft2) area of the Pad. No other incidents occurred that day during the unstacking procedure.

Following the incident the entire contents of the failed container and the spilled Pondcrete were transferred into a four by four by seven foot DOT Type 7A metal box with hand tools. This container was transferred to an indoor area (Building 788 [RCRA Unit Number 48]) for temporary holding while awaiting reprocessing. The location of the Pad where the Pondcrete had spilled was then cleaned by washing with water using brooms to remove Pondcrete from crevices in the asphalt. Approximately five gallons of wash water was then collected using a wet vacuum cleaner. This cleaning effort was continued until radiation levels were below the detection limit of the instruments being used. This liquid was then transferred to the Pondcrete processing area for reprocessing into Pondcrete.

Within a few hours following this spill, two portable ambient air monitors were moved to the Pad. One sampler was located in the center of the Pad and the second sampler was located on the eastern edge of the Pad, in the predominant downwind direction.

PAD 904 INTERIM STATUS CLOSURE PLAN

Analytical results indicated that concentrations of plutonium in air associated with that spill were below the Plant Safety Guide level of 0.01~pC1/m3.

July 22, 1988 Spill

The incident occurred at approximately 9:00 a.m. on Friday, July 22, 1988. The Plant Shift Superintendent (RCRA Emergency Director) immediately notified the Plant Radiation Monitoring group and the Plant Fire Department.

The spill resulted from activities related to unstacking the Pondcrete boxes. The boxes were being unstacked in an effort to prevent additional damage to a deformed box of Pondcrete. The first step in unstacking an array of Pondcrete boxes was the removal of the tarpaulin covering the array. During the process of tarpaulin removal one of the top boxes of the array slid off the array. The plastic liner of the triple walled Pondcrete box failed on impact and approximately 12 ft3 of Pondcrete was spilled onto the asphalt Pad. This 12 ft3 release of Pondcrete distributed itself across an area of approximately 36 ft2 of the Pad. The remainder of the unstacking procedure that day proceeded without incident.

The spill was cleaned by transferring the entire contents of the failed container and the spilled Pondcrete into a four foot by four foot by seven foot DOT Type 7A metal box with hand tools and transferring this container to an indoor area (Building 788 [RCRA Unit Number 48]) for temporary holding while awaiting reprocessing. The location of the Pad where the Pondcrete had spilled was then cleaned by washing with water using brooms to remove Pondcrete from crevices in the asphalt. This cleaning effort was continued until

PAD 904 INTERIM STATUS CLOSURE PLAN

radiation levels were below the 250 counts per minute, detection limit of the Ludlum Model 12 meter being used. Approximately 15 gallons of wash water was then collected using a wet vacuum cleaner. This liquid was then transferred to the Pondcrete processing area for reprocessing into Pondcrete.

Water samples from the water collected in the wet vacuum cleaner were found to contain gross Alpha and Beta at concentrations of 32 +/- 26 and 47 +/- 49 pCi/l, respectively. Samples of the concentrated Pondcrete liquids were collected near the northern berm. These samples were found to contain gross Alpha and Beta at concentrations of 1,300 +/- 300 and 2,200 +/- 300 pCi/l, respectively. In addition, one sample of sediment contaminated by liquid associated with the Pondcrete was also collected. Gross Alpha and Beta concentrations related to the evaporite sample were 18,000 +/- 1000 and 2,800 +/- 200 pCi/gm, respectively.

September 19, 1988

A leaking box of Pondcrete was identified during a routine inspection on September 19, 1988. The suspect box and two other boxes of Pondcrete were transferred to a metal crate to await reprocessing.

Saltcrete

June 26, Through July 16, 1989

Two boxes of leaking Saltcrete were found to have leaked a total of 11 pounds of dry material to Pad 904.

PAD 904 INTERIM STATUS CLOSURE PLAN

July 17 Through August 20, 1989

One box of leaking Saltcrete was found to have leaked a total of approximately two pounds of dry material to Pad 904.

Following identification of the Saltcrete storage problems, the entire contents of the failed container and the spilled Saltcrete were transferred into a four foot by four foot by seven foot metal container. The metal containers have been stored on Pad 904 awaiting reprocessing. The location of the Pad where the Saltcrete had spilled was cleaned by vacuuming until radiation levels were below the detection limit of the instruments being used. The collected material was transferred to Building 374 for reprocessing or stored on Pad 904 in a four foot by four foot by seven foot metal container awaiting reprocessing.

2.2.6.2 Releases to the Air

Releases to air from waste storage activities at Pad 904 are unlikely since the wastes are nonvolatile by nature. The most likely time a release to air would occur would be during a spill incident such a release would most likely consist of fine grained particles. As was stated in Section 2.2.5.1 there have been no releases that exceeded the Plant Screening Guide for plutonium in air of 0.01 pCi/m3.

2.2.6.3 Releases to Surface Water

During the period from August 1987 to June 6, 1988 Pad 904 existed without the runoff containment berms described in Sections 2.1 and 2.2.5.2. As a result of this configuration of the Pad all runoff would exit the Pad without retention. Based on the slope of the

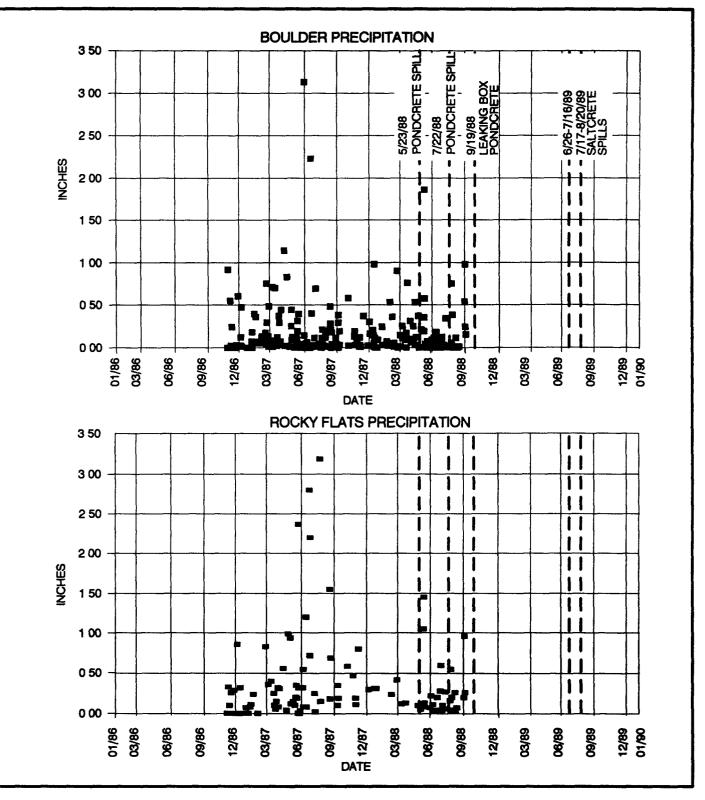
PAD 904 INTERIM STATUS CLOSURE PLAN

Pad these waters would be expected to exit the Pad to the north and east. Once the water had exited the Pad it would be intercepted by a ditch running along the east side of the Pad and this water would then be intercepted by a ditch running along the north side of the Pad (Figure 23). Once in the northern ditch the water is collected in a culvert and routed under Central Avenue. As the water exits the culvert it is routed east through a ditch running north of Central Avenue. Water in this ditch is then collected by a culvert and diverted to Pond B-4 (Figure 16) for retention prior to release.

On June 6, 1988 berms were constructed along the north, west and east sides of the Pad to contain a portion of the surface runoff from the Pad (Figures 3 and 4). However, as was stated in Section 2.2.5.2 the berms are capable of containing the runoff related to a precipitation event of approximately one-inch.

Records of daily precipitation at Rocky Flats for the period January 1, 1987 through September 15, 1988 are presented on Figure 24. These data were collected at Building 774 during 24-hour periods ending at 7:00 a.m. Comparison of the Rocky Flats daily data with those from the National Weather Services observation at Boulder (Figure 24), indicate that there may be some missing days in the Rocky Flats data, but overall the Rocky Flats record is judged to be good. Analysis of this information indicates that since the berms have been in place (June 6, 1988) through the period of record at Rocky Flats (September 15, 1988) there were no rainfall events greater than one inch. However, successive days of less than one inch precipitation events may also cause overtopping of the berm. Reports of berm overtopping by Plant

PAD 904 INTERIM STATUS CLOSURE PLAN



PRECIPITATION BOULDER AND ROCKY FLATS



PAD 904 INTERIM STATUS CLOSURE PLAN ROCKY FLATS PLANT GOLDEN, COLORADO PROJECT NO 667-10

FIGURE NO. 24

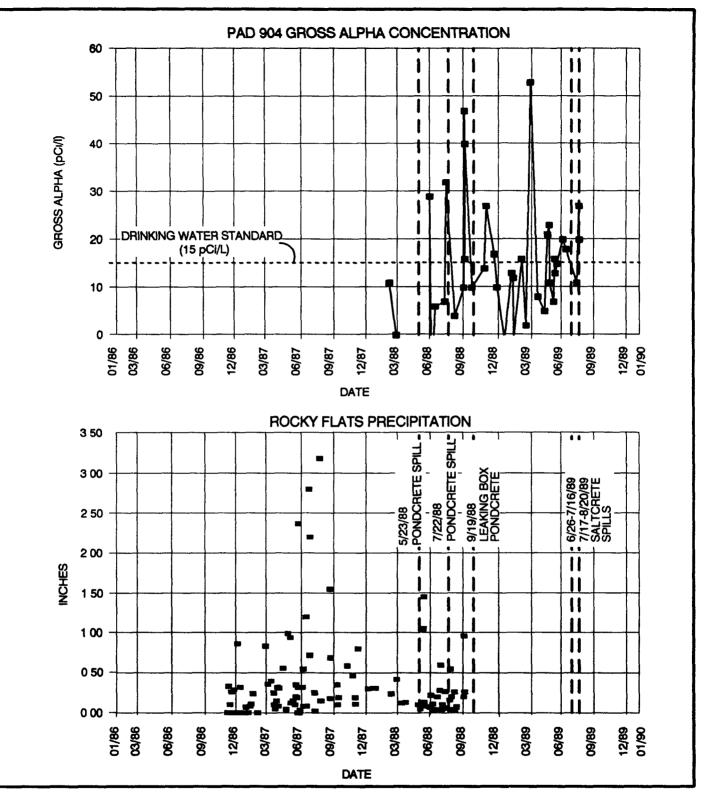
personnel suggest that the occurrence of these successive lower intensity precipitation events have indeed resulted in berm overtopping.

Collection of runoff water samples from ponded areas within the bermed area has been done in an effort to assess contaminant concentrations in runoff. Interpretation of the analytical results of these grab samples is difficult because of uncertainties in the relationship between the precipitation event and sample collection. These uncertainties may lead to sample concentration values being lower or higher than those related to the actual runoff water. Runoff concentrations could be underestimated by subsequent precipitation diluting the ponded water. Over estimation of runoff concentrations could occur due to a runoff volume insufficient to overtop the berm followed by a time lag before sample collection allowing evaporation of a portion of the ponded water. On the basis of the information presented above the interpretations given below are generalizations based upon uncertainty as to peak concentrations and average storm-related concentrations.

Gross alpha, gross beta and nitrate-nitrogen concentrations for grab samples of Pad 904 runoff for the period from February 12, 1988 through June 6, 1989 are presented on Figures 25, 26 and 27, respectively. The Pondcrete spills of May 23 and July 22, 1988 as well as the Pondcrete leakage of September 19, 1988 are highlighted on these figures.

No surface water was known to discharge to the environment as a result of these two spills and the one leak. All water used in Pad decontamination was contained on the Pad until removed by pumping. However, leakage of precipitation runoff under the berm has been

PAD 904 INTERIM STATUS CLOSURE PLAN

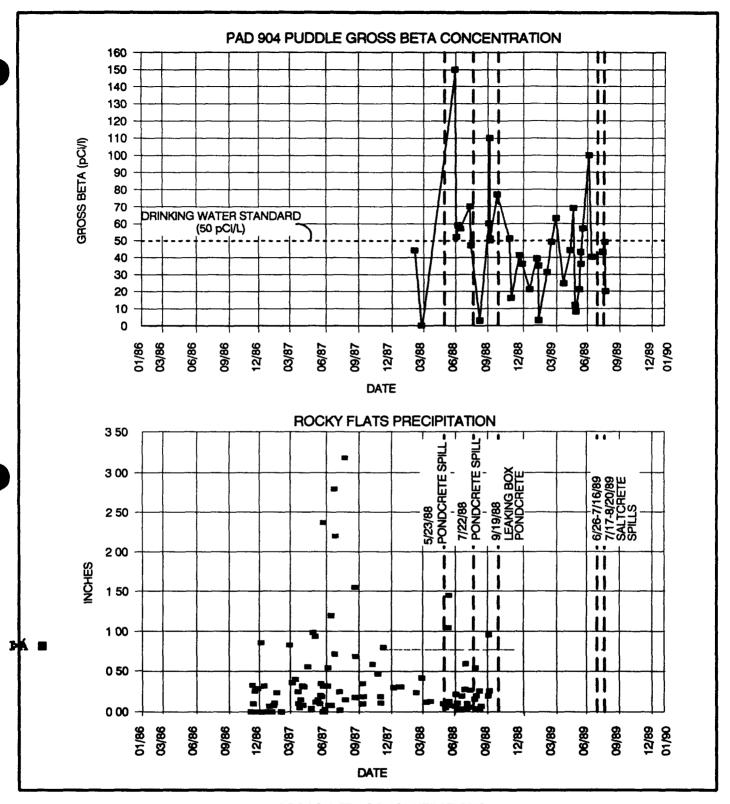


GROSS ALPHA CONCENTRATIONS IN PAD 904 PUDDLES



PAD 904 INTERIM STATUS CLOSURE PLAN ROCKY FLATS PLANT GOLDEN, COLORADO PROJECT NO. 667 10

FIGURE NO. 25

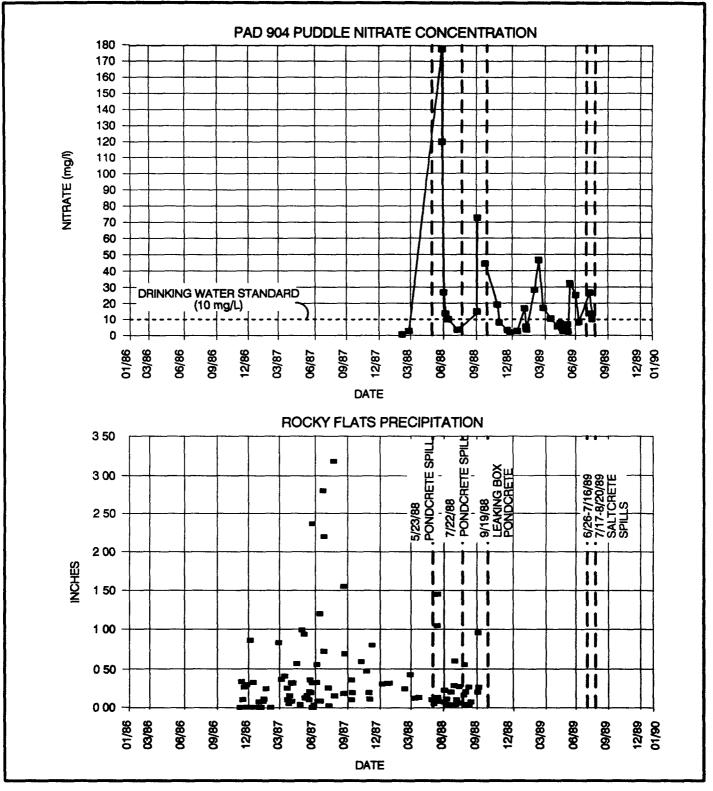


GROSS BETA CONCENTRATIONS IN PAD 904 PUDDLES



PAD 904 INTERIM STATUS CLOSURE PLAN ROCKY FLATS PLANT GOLDEN, COLORADO PROJECT NO 667-10

FIGURE NO. 26



NITRATE CONCENTRATIONS IN PAD 904 PUDDLES



PAD 904
INTERIM STATUS CLOSURE PLAN
ROCKY FLATS PLANT
GOLDEN, COLORADO

PROJECT NO 667-10

FIGURE NO 27

routinely observed by Rocky Flats personnel. Therefore, it is expected that some leakage may occur at approximately the concentrations presented on Figures 25 through 27.

Impact on isotope concentrations of the Pad runoff due to the July 22, 1988 Pondcrete spill is presented in Table 5. These data indicate that concentrations of plutonium, americium and uranium were generally an order of magnitude or more greater than pre-July 22 spill runoff concentrations.

Data for Pad 904 runoff sample concentrations of gross Alpha, gross beta and nitrates appear to be log-normally distributed (Figures 28, 29 and 30). The correlation coefficients for the lines drawn through these data vary from 0.99 to 1.0, strongly indicating the log-normal nature of the data and the excellent fit of the lines to the data.

Using these lines (Figures 28, 29 and 30) to describe the runoff data, 59 percent of all runoff samples were less than or equal to the gross alpha drinking water standard of 15 pCi/l, 63 percent of all runoff samples were less than or equal to the gross beta drinking water standard of 50 pCi/l and 52 percent of all runoff samples were less than or equal to the drinking water standard of 10 mg/l of nitrate-nitrogen,. This analysis indicates that the water released from the Pad was typically of good quality (did not exceed drinking water standards). Data reports for Pad 904 runoff data are found in Appendix E.

The analyses of the data presented above indicate that runoff from Pad 904 may be contributing to some elevated analyte concentrations in the South Walnut Creek water. It is believed that Pad 904

PAD 904 INTERIM STATUS CLOSURE PLAN

TABLE 5

ISOTOPE SPECIFIC ANALYSES BEFORE SPILL (JUNE 26, 1988)

AND AFTER SPILL (JULY 22, 1988)

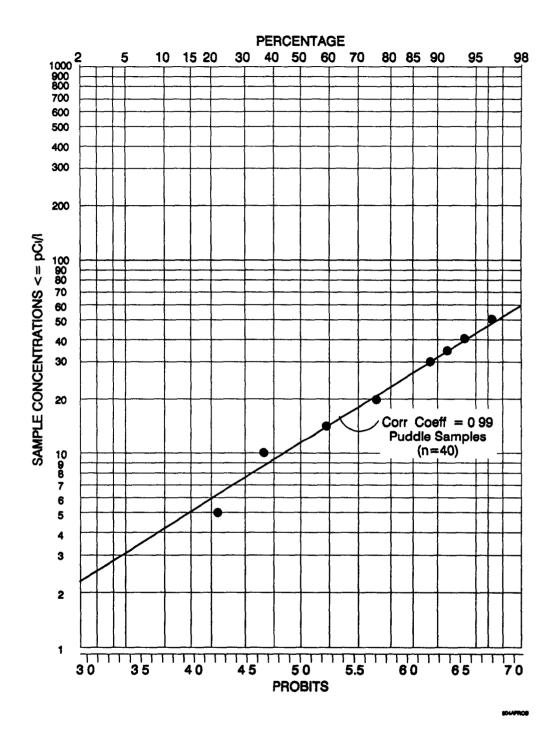
<u>Isotope</u>	<u>June 26, 1988</u>	July 22, 1988
Pu-238	0.017 ± 0.021	 3)
Pu-239	0.506 ± 0.088	620 ± 80
Am-241	0.834 ± 0.127	3200 ± 300
U-234	1.414 ± 0.231	140 ± 30
U-235		35 ± 17
U-238	1.312 ± 0.186	110 ± 30
Gross Alpha 1)		18000 ± 1000 ²⁾
Gross Beta 1)		2800 ± 200 ²⁾

Concentration (pCi/l, unless otherwise specified)

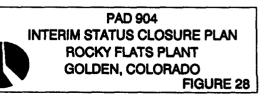
For sediment sample collected at northeast corner of 904 pad after 7/22/88 spill

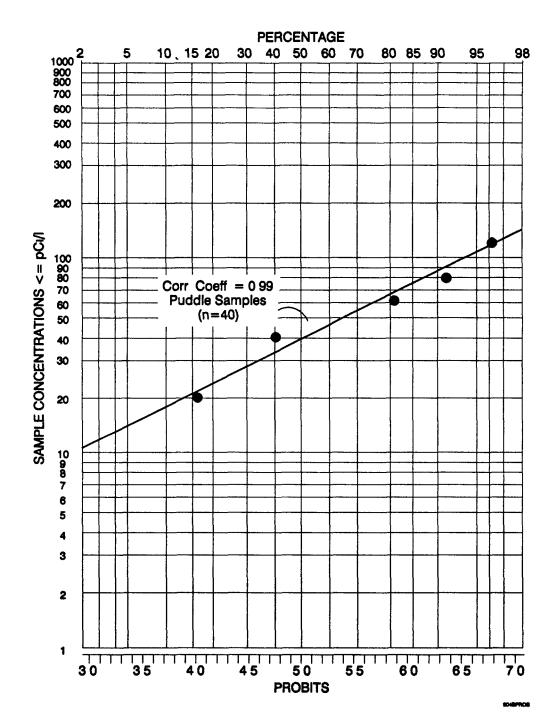
²⁾ pC1/gm

^{3) --} means no analyses for sample

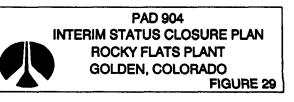


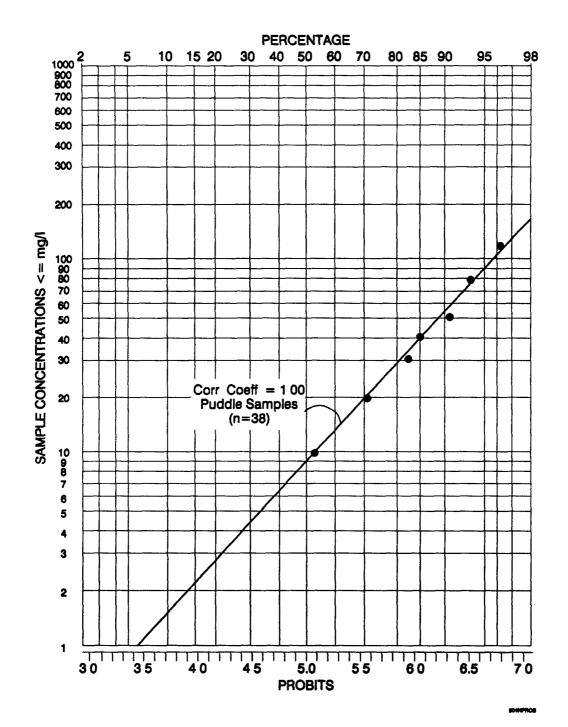
PROBABILITY OF RUNOFF GROSS ALPHA CONCENTRATIONS



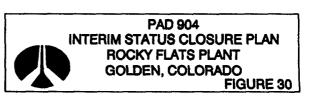


PROBABILITY OF RUNOFF GROSS BETA CONCENTRATIONS





PROBABILITY OF RUNOFF NITRATE CONCENTRATIONS



represents just one of many sources of contamination to the South Walnut Creek Drainage.

South Walnut Creek is diverted near Building 991 into Pond B-4, thereby bypassing ponds B-1 through B-3 (Figure 17). Ponds B-1 and B-2 are spill control ponds that normally do not discharge down the South Walnut Creek drainage. Pond B-3 is a holding pond for the treated effluent from the Rocky Flats Sanitary Wastewater Treatment Plant (Building 995). The water from Pond B-3 is spray evaporated near Pond B-3, unless the pipes are frozen. Pond B-4, which contains both treated sanitary effluent and incoming South Walnut Creek flow, intermittently discharges to Pond B-5 which is the last control point on the South Walnut Creek drainage. All discharges from Pond B-5 must meet the National Pollutant Discharge Elimination System (NPDES) Permit for the Rocky Flats Plant. B-5 is designated NPDES discharge location 006. The NPDES permit is currently being renegotiated, with completion expected in December 1989.

2.2.6.4 Releases to Soil

All spills which have occurred to date at Pad 904 have remained on the paved area and were immediately cleaned up, and therefore do not constitute releases to soil. However, contaminated runoff that leaves the Pad contacts soil in the adjacent ditches and flows through culverts to its final discharge to the South Walnut Creek drainage. Due to the relatively low concentrations of contaminants in Pad 904 runoff water (contaminant concentrations typically meet drinking water standards) concentrations of contaminants in soils adjacent to the Pad and in the South Walnut Creek drainage are expected to be very low.

PAD 904 INTERIM STATUS CLOSURE PLAN

Specifically, soil near the Pad was sampled following the May 23, 1988 spill incident and data related to this sampling is presented in Table 3 and on Figures 10, 11 and 12.

2.2.6.5 Releases to Groundwater

Groundwater should not be impacted by the Pad operations since, based on runoff data, contaminants released from the Pad in runoff are present in relatively low concentrations (typically meeting drinking water standards). No other releases to soil have occurred. Further, Pad 904 retains at least some of the precipitation which could conceivably leach contaminants from the previously contaminated soil which underlie the Pad.

An analysis of the concentrations of what are considered to be indicator parameters, based on the waste types found in Pondcrete, indicate that several indicator parameters were found at concentrations equal to or above performance criteria in groundwater near the Pad (Table 6). The following paragraphs discuss relevant parameters and the concentrations found.

The performance criterion for nitrate of 10 mg/l was met or exceeded only in groundwater samples collected from alluvial well 26-86 prior to the construction of Pad 904. Further, this alluvial well appears to be hydraulically disconnected from the Pad and appears to be hydraulically connected to the solar ponds.

The performance criterion for acetone of 0.005 mg/l was met or exceeded in groundwater samples collected from alluvial well 15-87 and bedrock wells 25-86BR, 5-87BR and 45-87BR. All occurrences of elevated concentrations were at approximately the time of construction of the Pad and approximately six to 12 months prior to the first Pondcrete spill at the Pad.

PAD 904 INTERIM STATUS CLOSURE PLAN

Table 6 Groundwater Concentrations in the Area of Pad 904

Performence Std.				3	(1/1)	(1/1)	(1/1) (0(1/1)	(1/130)	(1/100)(1/100)	3		(1/130) (1/130)	(1/13a
74 1741 1 1 4	nce Std.	5	0 002	0.005	15			8			20000		
ALLUVIAL	MELLS												
24-86	09/01/86	DRY	DRY	DRY	DRY	· <u>·</u>		DRY	-/-		DRY	÷	
24-86	09/24/87	DRY	DRY	DR ₹	DRY +	-/+		DRY	-/+			-/-	
24-86	12/05/87	DRY	DRY	DRY		·/•			-/-			-/-	
54-86	03/16/88	DRY	DRY	DRY		-/-			·+			·.	
24-86	05/23/88	DRY	DRY	₩		-/-			-/+		-	-/-	
24-86	88/80/60	DRY	DRY	DRY		-			· ÷			-/-	
54-86	11/22/88	DRY	DRY	DRY		÷			-/-			÷	
26-86	09/18/86	300.00	-0.005	SI		-/+			-/÷		SI	÷	
26-86	03/18/87	88.00	×	SI	+ SI	-/+		IS	-/+		+ SI	-/+	
56-86	08/28/87	8.8	X.	SI.	07	+/- 0 58	0.30	\$		1 10	8	+/-343.00	
56-86	12/05/87	DRY	DRY	DRY	DRY +	-/+			-/+		DRY		
26-86	03/16/88	DRY	DRY	DRY	DRY +	-/+			-/+		DRY +	÷	
56-86	05/17/88	DRY	DRY	DRY		-/-		DRY	-/-			-/-	
56-86	98/90/60	DRY	DRY	E		·/•		DRY	-/-			-/-	
56-86	11/22/88	DRY	DRY	DRY	DRY +	-/-		DRY	÷		DRY	÷	
33-86	09/12/86	DRY	DRY	DRY		-/+		DRY	-/-			-/+	
33-86	09/24/87	DRY	DRY	DRY		-/-		DRY	-/-		·	<u>.</u>	
33-86	12/05/87	DRY	DRY	DRY		-/+		DRY	-/-			-/-	
33-86	03/07/88	DRY	DRY	DR		-/+			-/-			-/-	
33-86	05/02/88	DRY	DRY	DR		-/-			-/+		DRY	-/-	
33-86	08/12/88	DRY	DRY	DRY		-/-		ORY	-/-			-/-	
33-86	11/08/88	DRY	DRY	DRY		-/-		DRY	-/-		•	<u>-</u>	
61-86	03/10/87	1.10	¥	IS	18	· ,			- /-			.	
61-86	05/04/87	5.5	X X	1S		-/-			-/-			-/-	
61-86	06/23/87	1.98	쭕	IS	+ SI	-/-		SI	-/-			-/-	
61-86	08/27/87	92.0	¥	SI	8	+/- 1.30	. 8	-/+ 00.0	09 0 -/+	0 20		-/-	
61-86	10/12/87	DRY	DRY	DRY	DRY +	- /-		DRY				-/-	
61-86	02/12/88	0.88 88.0	. 010 u	S	+ 00 0	+/- 0.13		0.0	+/- 0.16			' -	
61-86	04/18/88	1.19	. 010 u	SI	0.0		92 0	8	<u>-</u> /+	0.80	<210	-/-	
61-86	07/18/88	IS	. 010 u	<u>s</u>	+ SI	-/-			-/-			· <u>·</u>	
61-86	10/17/88	DRY	DRY	Ø ₹	DRY	-/		DRY	-/-			'	

Table 6 Groundwater Concentrations in the Area of Pad 904 (con't)

WELL # DATE Performance Std	DATE nce Std.	NITRATE (mg/l) 10	ACETONE (mg/l) 0.005	8EHT (mg/l) 0.005	PU 239,240 (pC1/1) 15	RANGE (pc1/l)	RANGE NDA (pci/l) (pci/l)	AN 241 (pC1/l) 30	RANGE MDA (pC1/1)(pC1/1)	MDA pC1/1)	TRITIUM (pC1/L) 20000	RANGE (pC1/l)	RANGE MDA (pC1/l) (pC1/l)
ALLUVIAL WELLS	WELLS				i	:							
04-87	05/20/87	5.80	₩ 700.	15	-/+ SI			-/+ SI	ر و		IS IS	1S +/- 1S +/-	
04-87	78/60/70	•	¥ 9	2 5	0.14 +/-	. 0 2	0.70	2.5	- 0.86 52	1.00	777 00	+/-333 00	
8-84 84-87	10/14/87	5.70 IS	X SI	0.002 *	-/+ 0.00 -/+ 1S			-/+ SI			SI SI	<u></u>	
04-87	02/15/88		. 010 u	18	-/+ 00.0	- 0.24		-/+ 00.0	- 0.14		<210	-/-	
04-87	04/13/88		. 010 u	13	2		0.17	8		0.60	~5 50	-/-	220 00
04-87	07/14/88	4. 8. 1	. 010. D ::	<u>s</u> :				DNYR +/-	. .		DNYR	;	
78-40	10/20/88	9.55	0.00	2	DNYR +/-			DNYR +/	•		DNYR	-/-	
10-87	10/12/87	DRY	DRY	DRY	DRY +/-			DRY +/-	٠		DRY	-/+	
10-87	02/25/88		DRY	DRY	DRY +/-			DRY +/-			DRY	-/-	
10-87	04/19/88	DRY	DRY	DRY				DRY +/-			DRY	-/+	
10-87	08/60/80	ORY	ORY	DRY				DRY +/-			DRY	-/-	
10-87	10/26/88	DRY	DRY	DRY				DRY +/-	į		DRY	· ;	
15-87	09/10/87	7.60	¥	SI	NR +/-			NR +/-	١		094>	- / +	
15-87	09/11/87		SI	2	0 52 +/-	. 0 12		0 83 +/-	. 0.15		Ä	-/+	
15-87	10/07/87	2	1.280 *	12	·/+ SI			-/+ SI			IS	<u>-</u>	
15-87	10/08/87		SI S	2	./+ SI						<u>s</u>	;	
15-87	10/08/87		2	2	0.00			-/+ 00.0	- 0.25		~200	-/-	
15-87	10/08/87	<u>s</u>	S.	2	0.06 +/-	8		o.0.			Z	÷	
15-87	02/29/88	3.88 88	. oto .	S	-/+ 00.0			-/+ 00.0			<210	-/-	
15-87	04/20/88	4.82	.010 U	S 1	-/+ 00.0		0 13	-/+ 00 o		٠. د	%	-/-	
15-87	08/09/88	DRY	DRY	DRY	-			DRY +/-	·		DRY	-/+	
15-87	10/31/88	DRY	DRY	ORY				DRY +/			DRY	- <u>-</u> -	
78-44	11/14/87	DRY	DRY	DRY	DRY +/-	•		DRY +/-			DRY	÷	
78-57	02/22/88	DRY	DRY	DRY							DRY	-/-	
78-77	04/18/88	DRY	DRY	DRY	DRY +/-	•		DRY +/-			DRY	-/+	
78-77	07/20/88	DR	DRY	DRY							DRY	-/+	
78-77	10/26/88	DRY	DRY	DRY					٠		DRY	-/+	

Table 6 Groundwater Concentrations in the Area of Pad 904 (con't)

WELL # DATE Performence Std	DATE nce Std.	NITRATE (mg/l)	ACETONE (mg/l) 0.005	BEHT (mg/l) 0.005	PU 239,240 (PC1/1)	RANGE MDA (pC:/l) (pC:/l)	(1/12d)	AM 241 (pc1/1) 30	RANGE NDA (pci/l)(pci/l)	MDA OCI/L)	TRITIUM (pC1/L) 20000		RANGE MDA (pC1/1) (pCi/1)
BEDROCK WELLS	WELLS	l L											
23-868R 23-868R	11/25/86 03/18/87	S Z	.010 U	15	15 +/-						15	÷÷	
23-868R 23-868R	06/24/87	S S	¥ ¥	SI SI				-/+ 1S -/-			S I	÷ ÷	
23-868R	01/15/88	. 26 	. 010 . 010 	S 5	-/+ 00 00	- 0 16	0 91	2 5	0.11	0.61	<220 <210	· ; ;	
23-868R	05/23/88	0.00	200	: S	88		0 13	88		29.0	200 700 700 700 700 700 700 700 700 700	÷	
23-868R 23-868R	09/08/88 11/30/88	SI 1S	. 010 . 0 10 U	18 18	-/+ SI			-/+ SI			18 18	÷ ÷	
25-868R	11/07/86	2	0.017 *	SI	-/+ SI						IS	- <u>-</u> -	
25-868R 25-868R	03/18/87	0.28 20 U	¥	S S	-/+ SI			-/+ SI			s s	÷ ÷	
25-86BR	08/28/87	;	£	18	&		0.70	8.	- 0.18	0 40	<492	÷:	
25-868R 25-868R	01/15/88	0.0	J 010.	S 5	-/+ 00 0	67 0 -	8 5	NR +/-		0 53	6250 4250 4550	÷	
25-86BR	03/21/88	0.12	. 010 U	S	}			0 03 +/-	- 0 30		\$10	· ÷	
25-868R	05/18/88	0.07	J 050	<u>s</u>	0 02 +/-	- 0 05	0.15	-/+ E			% \$ \$		
25-268R	09/13/88	.02 U	. oto . o	2 2	E E						5 00	÷	
25-868R	12/06/88	0.1	.010 c	<u>s</u>					•		~ 550	-	
05-87BR	06/11/87	SI	• 900 0	SI	-/+ SI						SI	-/+	
05-87BR	06/12/87	9.50	¥	S	-/+ SI			-/+ SI			18	-/-	
05-878R	10//06/87	8. 6 8. 5	¥ 9	SI 5	-/+ 99.0 -/+ 30.0	40	- 8		1,41	2 40	4493 4460	÷ ;	
05-87BR	10/12/87		.030 c	: S	-/+ SI	•					SI	· +	
05-87BR	02/22/88		. oto	18	-/+ 00 O	0					<220	-,	
05-87BR	04/11/88	. 8.	. 906	S	\approx		0.19				<220	-/+	220 00 220 00
05-878R	07/19/88	87.6	. of o	2 5	DNYR +/-						DAYR Section	÷ :	
05-87BR	11/14/88	0.05 1S	.010. u oto	<u>s</u> s	1S +/			-/+ *!			IS IS	<u> </u>	

Table 6 Groundwater Concentrations in the Area of Pad 904 (con't)

WELL # Performa	WELL # DATE Performance Std.	NITRATE (mg/l) 10	ACETONE (mg/l) 0.005	BEHT (mg/l) 0.005	PU 239,240 (pC1/1) 15	RANGE (pc1/1)	MDA (pc1/l)	RANGE MDA AM 241 (pci/l) (pci/l) (pci/l) 30	RANGE MDA (pci/l)(pci/l)	MDA (pC1/l)	TRITIUM (pC1/1) 2000	RANGE MDA (pCı/l) (pCı/l)	MOA (pc1/t)
BEDROCK WELLS	WELLS												
09-87BR	06/19/87	SI	0.003 *	SI	/+ SI			/+ SI			+ SI	<u>.</u>	
00-878P	10/12/87	8	4	2	-/+ 80 O			-/+ 00 0	200		510.00+	510 00 +/-200 00	
20-8-00 08/8-00	10/12/07	7.	10	2 2	/· 8.5			\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \			2017	25 27 - /	
4076-00	02/26/01 02/26/00		2 5	? .	2			27			750 00 4/- 80	00 00 -/-	
07-07-BK	00/62/20	9.6	2 6	2 :	3.0	ה ה	!	MK -/-			200.000	8 8	
23-87BK	04/19/88	2.81	0 010.	2	8		0.1	/+ *0 o	0.24	۳.۲	06 -/+ 00 0CZ	00 06 -/-	
09-87BR	08/09/88	2.57	. oto	S		•					2	/-100 00	
09-87BR	10/26/88	2.02	010 C	2	DNYR +/-			DNYR +/-			DNYR +	-/-	
16-87BR	78/10/87	0.46	¥	SI	NR +/-	,		NR +/-			\$	- /	
16-87BR	09/15/87	IS	IS	IS	-/+			NR +/-			·	-/+	
16-87BR	10/16/87	1.58	£	<u>s</u>	S			5	20 0			-/+	
16-87BR	10/16/87	SI	.010 U	S	-/+ \$1							-/+	
16-87BR	02/29/88	0.35	.010 U	IS	-/+ 00 0			0.03 +/-	. 0 12		_	-/-	
16-87BR	04/21/88	0.05	.010 U	SI	0 02 +/-			0 02 +/-		0.51		-/+	
16-87BR	08/09/88	0.02 U	010 U	S	-/+ 00 0			0 02 +/-		98	<210 +		
16-87BR	10/31/88	1.46	. oto	22	DNYR +/-			DNYR +/-				-/-	
45-87BR	11/23/87	0.02 U	.010 U	S	-/+ 00 0	. 0 12	0.56	-/+ 00.0	. 1 40	%. 8.		-/-	
45-87BR	11/23/87	IS	٠13 ع	SI	-/+ SI			/+ SI				·-	
45-87BR	02/25/88	0.02 U	.010 U	S	-/+ 00 0	- 0.18		NR +/-				-/-	
45-87BR	04/18/88	0.0	200.	18	-/+ 00 0		0.15	0 10 +/-	. 0 16	0.81		-/-	
45-87BR	07/21/88	0.07	.010 U	2	DNYR +/-			DNYR +/-				<u>.</u>	
45-87BR	10/17/88	90.0	. 010 u	S							DNYR +	-/+	
KEY:													
B= PRESE	B= PRESENT IN LAB BLANK	BLANK	244 445	J= PRESI	Ja PRESENT BELOW DETECTION LIMIT	ECTION LI	MIT						
DNYR= DA	BENI# DIS(Z*EINILMEATL)FRINALAIE DNYR# DATA WOT YET RECEIVED	RECEIVE	MALAIE	WR= AKA	MDA* MINIMUM DESECTABLE ACTIVITY WR* ANALYTE NOT REPORTED	BLE ACITY RTED							
DRY= DRY	DRY= DRY WELL; NO SAMPLE	SAMPLE		U= ANAL	U= ANALYZED BUT NOT DETECTED	DETECTED							
ISH INST	ISE INSUFFICIENT SAMPLE	SAMPLE			** ADJUSTED VALUE BASED ON CONCENTRATION IN LAB BLANK	SED ON CC	MCENTRAT	ION IN LAB BE	-ANK				

The performance criterion for bis(2-ethylhexyl)phthalate (BEHT) of 0.005 mg/l was never found to be met or exceeded in water collected from alluvial or bedrock wells.

The performance criteria for Plutonium-239,-240 and americium-241 of 15 and 30 pCi/l, respectively, were not found to be met or exceeded in any of the groundwater samples collected from either the alluvial or bedrock aquifer systems near Pad 904.

PAD 904 INTERIM STATUS CLOSURE PLAN

3.0 CLOSURE PLAN SUMMARY

3.1 Closure Objectives

This interim status closure plan has been prepared to meet the performance standards of 6 CCR 1007-3, Section 265.111. The promulgated standards require a facility be closed in a manner that:

- o Minimizes the need for further maintenance; and
- O Controls, minimizes or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous waste constituents, leachate, contaminated rainfall, or waste decomposition products to the ground or surface waters or to the atmosphere.

3.2 Closure Activities

The progression of activities necessary to complete closure is shown in Figure 3. Principal activities include:

- o Removal of all wastes currently stored on Pad 904 Area A,
- o Decontamination of Pad surfaces (if required),
- Verification of Pad decontamination (if required),
- Verification of acceptable levels of soil contamination,

PAD 904 INTERIM STATUS CLOSURE PLAN

- Decontamination of soil (if required),
- Verification of soil decontamination (if required),
- o Performance standard compliance.

All necessary actions will be taken at Pad 904 to ensure compliance with the closure performance standards.

3.3 Closure Schedule

The CDH Director and the EPA Regional Administrator will be notified of the intent to close Storage Pad 904, 45 days prior to the removal of the last waste volume. The closure period will begin when the last shipment of waste leaves Pad 904.

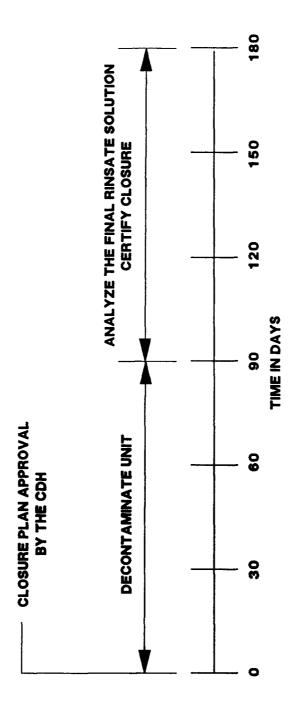
Decontamination of the Pad and soil sampling will be accomplished within 90 days from the beginning of closure. The decontamination of equipment will require an additional 10 days. An additional 90 days will be required for the receipt of analytical results.

Assuming the unit and nearby soil is shown to be sufficiently clean after one decontamination round, closure will be certified 180 days after closure operations begin. Figure 31 summarizes the currently anticipated closure activities and schedule. If the analysis of the final rinse solution or soil samples indicates contamination is present above the performance standards, the closure plan will be amended to allow additional time for further decontamination and analysis. If this occurs both the CDH Director and the EPA Regional Administrator will be immediately notified of the delay

PAD 904 INTERIM STATUS CLOSURE PLAN

PAD 904
INTERIM STATUS CLOSURE PLAN
ROCKY FLATS PLANT
GOLDEN, COLORADO
FIGURE 31

SCHEDULE OF CLOSURE ACTIVITIES



in closure, and documentation supporting the closure period extension will be submitted.

3.4 Administration of the Closure Plan

The interim status closure plan for Storage Pad 904 (SWMU 15 Area A) will be maintained at the Rocky Flats Area Office, Building 111, U.S. Department of Energy. The person responsible for storing and updating this copy of the closure plan is:

David P. Simonson
Manager
U.S. Department of Energy
Rocky Flats Operations (RFO)
P.O. Box 928
Golden, Colorado 80402
Phone: (303) 966-202

4.0 REMOVAL OF HAZARDOUS WASTE INVENTORY

All mixed low-level radioactive and hazardous waste will be removed from Pad 904 Area A by October 1991. This waste will be transported offsite for disposal at the Nevada Test Site (NTS). Until October 1991 the storage of mixed low-level radioactive and hazardous waste will continue at Pad 904.

PAD 904 INTERIM STATUS CLOSURE PLAN

5.0 OFF-SITE WASTE MANAGEMENT

The only waste residues from closure of this unit requiring treatment/disposal will be rinsate from possible decontamination activities. It is anticipated that the rinsate generated will be treated on-site at the Building 374 treatment facility.

All waste removed from Pad 904 Area A and shipped offsite will be disposed at the Nevada Test Site (NTS). This waste disposal will be covered by the operations and regulations that pertain to NTS. The disposal method will consist of shallow land disposal.

PAD 904 INTERIM STATUS CLOSURE PLAN

6.0 DECONTAMINATION

6.1 Closure Performance Criteria

Decontamination of Pad 904 Area and all ancillary and cleaning equipment will be conducted until levels of hazardous constituents are found at concentrations less than or equal to those protective of human health and the environment.

Every hazardous constituent identified in Pondcrete or Saltcrete (See Section 2.2.3) was evaluated as a potential decontamination indicator. The hazardous constituents identified in the wastes were broken into groups of hazardous organics, radionuclides or conventional parameters (nitrate). The mobility of the compound in each of these groups was assessed. The most mobile and least mobile compounds were chosen from each group for the indicator list. Mobility was based upon mobility in water, and did not address mobility as a saltating or resuspended particulate.

The rationale for evaluating most and least mobile constituents is so that the greatest extent of any plume as well as source terms can be identified. The most mobile compound can be used to delimit the maximum extent of plume migration; whereas the least mobile compound may remain near the source of contamination and cause a continuing release. If two compounds in the same group had similar mobilities, the compound with the higher concentration in the waste was selected for development of the performance standard.

Mobility was assessed using the distribution coefficient (Kd) with units of liters/kilogram. The distribution coefficient is a measure of the likelihood of a compound to be adsorbed to a soil particle rather than stay in solution. The Kd value represents the

PAD 904 INTERIM STATUS CLOSURE PLAN

ratio of the amount of a compound adsorbed to soil versus the amount of the compound in water. The greater the distribution coefficient the less mobile the compound in water (Freeze and Distribution coefficients were available for Cherry 1979). radionuclides. The octanol/water partition coefficient was used for organic compounds. The octanol/water partition coefficient (Kow) is an indirect measurement of the distribution coefficient with the compounds being related by a constant for any particular soil (USEPA 1983). The greater the octanol/water partition coefficient the less mobile the compound in water. Table 7 summarizes the mobility evaluation for parameters identified in Pondcrete or Saltcrete.

Table 8 details the hazardous constituents and concentrations that will serve as indicator parameters for decontamination purposes. In general, there are no applicable standards for soil for those compounds listed in Table 8. In cases where no applicable standards for soil exist the partition coefficient or octanol water partition coefficient for the compound was used to establish an acceptable soil concentration. These acceptable soil concentrations are those for which the applicable water standard will not be exceeded based on the distribution coefficient.

With respect to radioactive contamination, the levels of fixed and removable activity will determine if an initial or subsequent decontamination round is required. Decontamination will be considered complete when:

o The direct count does not exceed 250 counts per minute of alpha activity, and

PAD 904 INTERIM STATUS CLOSURE PLAN

TABLE 7

MOBILITY OF HAZARDOUS COMPOUNDS IDENTIFIED IN SALTCRETE OR PONDCRETE

Compound	Dist. Coe:		anol/Water Part. (unitless)
Nitrate		1 (assumed) (Freeze and Cherry	 1979)
Acetone		1 (since miscible) (USEPA 1983)	
Benzene			1 EE 2.28 (USEPA 1983)
Bis(2-ethylhexyl)ph	thalate		1 EE 5.3 (USEPA 1983)
2-Butanone			1 (USEPA 1983)
Methylene Chloride			1 EE 1.3 (USEPA 1983)
Perchloroethylene			1 EE 2.88 (USEPA 1983)
1,1,2,2-Tetrachloro	ethane		1 EE 2.3-4.9 (USEPA 1983)
Toluene			1 EE 2.07-2.69 (USEPA 1983)
Plutonium-239		1 EE 3.30-6.56 (Nelson, Larsen, E	 Penrose 1984)
Americium-241 (Torstenfelt 1	986)	1 EE 3.30-6.56 (be similarity to plut	

Cyanide, sulfide and uranium were not evaluated due to low concentrations present in the waste.

PAD 904 INTERIM STATUS CLOSURE PLAN

TABLE 8

DECONTAMINATION INDICATORS

<u>Parameter</u>	Applicable Standard	Concentr	ation
Nitrate	Drinking Water	10	mg/l
	Acceptable Soil Level	10	mg/kg
Acetone	Detection Limit	5	ug/l
	Acceptable Soil Level	5	mg/kg
BEHT*	Detection Limit	5	ug/l
	Acceptable Soil Level	1000	mg/kg
Plutonium-239	CWQ (see note)	15	pCi/l
	EPA (see note)	13 - 20	pCi/g
Americium-241	CWQ	30	pCi/l
	Proposed TIS	20	pCi/g

^{*} BEHT is Bis(2-ethylhexyl)phthalate

CWQ: Colorado Water Quality Standard, Notice of Final Adoption of Temporary Rule, State of Colorado Water Quality Control Commission, July 11, 1989.

Proposed TIS: Proposed Transuranics in Soil Standard, US Environmental Protection Agency, 1986.

EPA: Interim Guidance: Dose Limits for Persons Exposed to Transuranium Elements in the General Environment. USEPA 1986. (assuming soil bulk density at 1.00 to 1.55 g/cc [Hausenbuiller, 1972])

o The removable alpha activity does not exceed 20 disintegrations per minute (dpm) per 100 cm2.

6.2 Decontamination of Pad 904

The history of operations at Pad 904 Area A and the runoff samples from this Pad indicate that the Pad must be decontaminated. Since asphalt is a nearly impermeable material, surface cleaning is considered adequate to decontaminate the Pad. The Pad surfaces will be cleaned by one of several commonly implemented methods, including hydroblasting/water wash or foam cleaning. A single wash/rinse cycle is expected to be adequate to decontaminate the Pad. Cleaning Solution E from Table 9, which is effective in removing non-oily mixed wastes, will be used in this operation. The wash and rinsate solutions will be collected by a vacuum unit in the immediate vicinity of cleaning operations as well as along the Pad berms.

Prior to initiation of decontamination activities, a "raw rinsate" sample will be collected for analysis of those hazardous parameters listed in Table 9, and these results will be considered as background levels. Following the decontamination efforts, "used rinsate" samples will be collected and analyzed. The difference in concentration between these two results will be compared to the performance standards listed in Table 8. The unit will meet the performance standards if the adjusted concentration of the "used rinsate" is below the performance standard concentrations. single wash/rinse cycle is not adequate to meet the above criteria, the wash/rinse cycle will be repeated until the criteria are met. If the performance standards cannot be met by decontamination as described above, the closure plan for this unit will be amended. If this occurs both the CDH Director and the EPA Regional

PAD 904 INTERIM STATUS CLOSURE PLAN

TABLE 9

GENERAL PURPOSE DECONTAMINATION SOLUTIONS
FOR HAZARDOUS, RADIOACTIVE AND TRU-MIXED WASTES

SOL	UTION	PREPARATION DIRECTIONS	SUSPECTED WASTE COMPONENTS
1.	A	To 10 gallons of water, add 4 pounds of sodium carbonate and 4 pounds of trisodium phosphate. Stir until evenly mixed.	Inorganic acids ionic metals
2.	В	To 10 gallons of water, add 8 pounds of calcium hypochlorite and 1/2 pound of sodium hydroxide. Stir with wooden or plastic stirrer until evenly mixed.	Cyanides, other inorganic that are not acidic
3.	С	To 10 gallons of water, add 4 pounds of trisodium phosphate. Stir until evenly mixed.	Solvents, organic compounds, waste oil
4.	D	To 10 gallons of water, add 1 pint of concentrated sulfuric acid slowly while stirring.	Caustic waste
5.	E	"SOLNI" or an equivalent commer- cially available solution will be used.	Mixed waste, TRU mixed waste (non-oily)
6.	F	Use full strength petroleum ether or similar organic solvent.	Organic compounds
7.	G	Use water.	Dilute organic and inorganic contaminants

PAD 904 INTERIM STATUS CLOSURE PLAN

Administrator will be immediately notified of the delay in closure, and documentation supporting the extension of the closure period will be submitted.

All sampling/testing of rinsate will be conducted using EPAapproved procedures and minimum detection levels.

To characterize the contamination of radioactive substances, measurements will be taken to determine levels of fixed and removable radioactivity. Total alpha activity levels of the unit will be measured with an air-proportional-type alpha survey meter. Smears will be taken and counted according to plant procedures to determine the level of removable activity. The difference between the air-proportional alpha measurements and the smear activity measurements equals the fixed activity of the location. The levels of fixed and removable activity will determine if the unit requires cleaning, or if it can be used in its current condition.

6.3 Decontamination of Auxiliary Equipment

All auxiliary equipment which was used at Pad 904 Area A will be decontaminated by steam cleaning at the north edge of the Pad. Decontamination will include:

- 1. A rinse with a steam cleaner using water free of volatile organics.
- 2. Scrubbing with brushes using a solution of water with Alconox detergent that is free of volatile organics.
- 3. A final rinse with the steam cleaner using water free of volatile organics.

PAD 904 INTERIM STATUS CLOSURE PLAN

This work will be done immediately adjacent to the water runoff sample collection berms to minimize the area of the Pad impacted by these operations, and to provide for easy collection of the liquids. This equipment includes forklifts and trucks used for transportation as well as all units used to clean the Pad. Since only storage of the waste on the Pad was conducted, no other equipment need be decontaminated. All wash and rinsate water will be collected and treated on-site at Building 374.

6.4 Decontamination of Equipment Used During Closure

Upon completion of each phase of decontamination required for closure, equipment will be decontaminated by steam cleaning as described in the previous section. All disposable contaminated equipment accumulated during closure will be containerized and shipped to an authorized off-site disposal facility.

6.5 Contaminated Soils

The contaminant concentrations in soils caused by operation of Pad 904 Area A are not expected to be at levels that will require decontamination activities. In addition, contamination was evident in the area of the Pad prior to the construction of the Pad (Section 2.2.5.3). For these reasons no soil decontamination is proposed for the Pad area during closure. These pre-existing conditions will be addressed as a part of the CERCLA activities associated with Pad 903.

PAD 904 INTERIM STATUS CLOSURE PLAN

6.6 Removal of Hazardous Waste Residues

Approximately 40,000 gallons of wastewater may be generated by decontamination processes. The waste will be collected and placed in tank trucks and this effluent will be transferred to Building 374 for treatment.

PAD 904 INTERIM STATUS CLOSURE PLAN

7.0 DECONTAMINATION VERIFICATION

7.1 Pad 904

The success of decontamination procedures for Pad 904 Area A and related equipment will be measured by comparing the adjusted concentration of appropriate substances in rinsate with the performance standards listed in Table 8. Testing will be conducted using EPA-approved procedures and minimum detection levels.

In verification tests for water, a "raw rinsate" sample will be collected for analysis of those hazardous parameters listed in Table 8, and these results will be considered background levels. Following the decontamination efforts, "used rinsate" samples will be collected and analyzed for those hazardous constituents listed in Table 8, and the difference in concentration between these two results will be compared to the performance standards listed in Table 8. The unit will be judged to meet the performance standards if the adjusted concentration of the "used rinsate" is below the performance standard concentrations.

Decontamination rinsate sources will be grab-sampled after the preparation of 10,000 gallons of cleaning solution. A wash/rinse is expected to require approximately 40,000 gallons of water. Four samples of the rinsate source will be taken.

One composite sample of the used rinse water will be collected. This sample will be taken as eight separate grab samples from the rinse solution collected in the vacuum unit during the rinse activities. The eight separate grab samples will be composited for analysis.

PAD 904 INTERIM STATUS CLOSURE PLAN

To verify the decontamination of radioactive substances, measurements will be taken to determine levels of fixed and removable radioactivity. The unit will be considered clean if the direct count does not exceed 250 counts per minute of alpha activity, and the removable alpha activity does not exceed 20 dpm/100 cm 2 .

7.2 Surface Water

As discussed in Section 2.2.6.3, South Walnut Creek may potentially be impacted by runoff from Pad 904 Area A. However, the runoff from the Pad quickly leaves the Pad and flows through various ditches and culverts into Pond B-4 and finally pond B-5 where it is monitored prior to offsite discharge. Since these ditches are within areas undergoing CERCLA investigations and since this water must meet NPDES Permit conditions before discharge, it is felt that additional surface water sampling or remediation activities are not warranted following decontamination of the Pad 904 surface.

7.3 Soils

7.3.1 Beneath Pad 904

Degradation of soil beneath the Pad due to storage activities on Pad 904 Area A is not expected due to the low permeability of asphalt and the positive drainage provided by the 0.7 percent slope of the Pad. Cursory visual inspections of the Pad have not identified cracks or other defects from which contaminated materials could reach the environment. However, detailed inspections are not currently possible since large areas of the Pad are covered with stored waste.

PAD 904 INTERIM STATUS CLOSURE PLAN

When decontamination activities are completed on Pad 904, the Pad will be inspected by an independent registered professional engineer for cracks or other indications that the integrity of the Pad has been compromised. This inspection will include the review of construction and repair records to assess non-visable degredation of the pad. If such an area is identified, these locations will be noted and addressed during the CERCLA activities related to Pad 903.

7.3.2 Adjacent to Pad 904

Soil contamination immediately adjacent to Pad 904 is not expected since all unbermed edges of the Pad have a 0.7% slope toward the bermed areas of the Pad. However, as was stated in Section 2.2.6.3, surface water runoff is believed to have exited the Pad to the east and north prior to the construction of the berms (June 6, 1988). Surface water runoff has also overtopped the berms and exited the Pad to the north following the construction of the berms.

On the basis of this information, soils may be degraded adjacent to the Pad as a result of storage activities at Pad 904 Area A. As presented in Section 2.2.5.3, the magnitude of the degradation due to activities at Pad 904 Area A are minuscule in comparison to the degradation believed to have been caused by activities at Pad 903. For this reason decontamination of soil adjacent to Pad 904 will be addressed as part of the CERCLA activities related to Pad 903.

PAD 904 INTERIM STATUS CLOSURE PLAN

7.4 Groundwater

As discussed in Section 2.2.6.5, groundwater does not appear to have been impacted by activities at Pad 904 Area A, and as such no groundwater decontamination is warranted. However, sampling of groundwater will continue at those wells presented in Section 2.2.5.4 as part of the ongoing Environmental Restoration Program at the Plant.

7.5 Analytical Methods

The analytical methods to be used in evaluating the success of decontamination efforts, will be those documented in SW-846, or other approved EPA methods. If no approved EPA method is available, then a generally accepted laboratory technique will be used. Fixed and removable radioactivity levels will be analyzed by using an air-proportional-type alpha survey meter (total alpha activity levels) and Smear activity measurements (removable activity).

PAD 904 INTERIM STATUS CLOSURE PLAN

8.0 CLOSURE SCHEDULE

The CDH and the EPA Regional Administrator will be notified of the intent to close Unit 15 (Pad 904 Area A), 45 days prior to beginning the closure. Decontamination of the unit will be accomplished within 90 days from the beginning of closure. The decontamination of equipment will require 10 additional days. An additional 90 days will be required prior to receiving analytical results.

Assuming the unit is shown to be sufficiently clean after one decontamination round, closure will be certified 180 days after closure plan approval (Figure 31). If the analysis of the final rinse solution indicates contamination is still present above the performance standards, the closure schedule will be extended to allow additional time for further decontamination and analysis.

PAD 904 INTERIM STATUS CLOSURE PLAN

9.0 CLOSURE COST AND FINANCIAL ASSURANCE

State and Federal governments are exempt from the financial requirements imposed by Subpart H of 6 CCR 1007-3, Section 265.140 (c). Because the Rocky Flats Plant is a federally-owned facility, no cost estimates or financial assurance documentation is required. Cost estimates are presented in Table 10 for planning, budgeting and informational purposes. These estimates can in no way be considered binding.

The estimates presented in Table 10 are based on a worst case scenario in which the entire unit undergoing closure is found to be contaminated. These assumptions are expected to result in an overestimation of the actual costs that will be incurred, since this unit is expected to be clean. These estimates do not include the cost of reprocessing, repackaging, shipping or offsite disposal of Pondcrete or Saltcrete.

PAD 904 INTERIM STATUS CLOSURE PLAN

TABLE 10 COST ESTIMATE FOR CLOSURE OF UNIT 15

Engineering Design and Inspection	\$15,000.00
Equipment	30,000.00
Decontamination Monitoring	5,000.00
Treatment/Disposal	6,400.00
Contingency	8,000.00
TOTAL	\$64,400.00

10.0 SITE ACCESS AND SECURITY

Access to the work area will be limited to authorized personnel only. Exit from the working area will be through a clean, restricted area in the decontamination area. Existing security measures at the Rocky Flats Plant meet the requirements of 6 CCR 1007-3, Section 265.14. These include:

- o A three-strand barbed-wire cattle fence surrounding the facility posted to identify the land as a government reservation/restricted area,
- o A fence and armed guards posted 24 hours daily at two gates to the controlled area of the facility, and
- o Surveillance by security cameras 24 hours daily.

Existing fences and gates are operated and maintained by DOE. Maintenance requirements will be performed by DOE regardless of closure activities at the site.

PAD 904 INTERIM STATUS CLOSURE PLAN

11.0 HEALTH AND SAFETY

A site-specific Health and Safety Plan covering decontamination of the site, will be prepared two months before closure activities begin. The plan will comply with all Occupational Safety and Health Administration (OSHA), CDH, EPA, and DOE requirements.

PAD 904 INTERIM STATUS CLOSURE PLAN

12.0 POST-CLOSURE MONITORING

The implementation of post-closure monitoring is not necessary due to the contained nature of the container storage area.

PAD 904 INTERIM STATUS CLOSURE PLAN

13.0 CLOSURE CERTIFICATION

After completion of closure, the owner or operator and an independent certified registered engineer will submit certification of closure, based upon compliance with the closure plan, to the CDH and the EPA Regional Administrator.

The independent registered professional engineer will periodically review the closure operations in enough detail to assure final certification of closure. The final certification of closure will state that the closure procedures and standards have been carried out as described in the approved closure plan. In order to certify the performance and completion of closure activities, the independent registered professional engineer will review test results and inspect the site to verify the closure plan was carried out as approved. Both the operator and the independent registered professional engineer will submit a written document to the CDH and the EPA Regional Administrator to certify closure activities were conducted in accordance with the approved closure plan.

PAD 904 INTERIM STATUS CLOSURE PLAN

14.0 REFERENCES

- Colorado Water Quality Control Commission. July 11, 1989. Colorado Water Quality Standard, Notice of Final Adoption of Temporary Rule.
- Freeze, R. A. and J. A. Cherry. 1979. Groundwater. Prentice Hall Inc., Englewood Cliffs, New Jersey.
- Nelson, D. M., R. P. Larsen and W. R. Penrose. 1984. "Chemical Speciation of Plutonium in Natural Waters," Symposium on Environmental Research for Actinide Elements. Conf-8311110-5, DE84 014761.
- Rockwell International Corporation. 1988. Resource Conservation and Recovery Act Part B Operating Permit Application: Rocky Flats Plant Transuranic (TRU) Mixed Wastes. Volumes I through V. U.S. Department of Energy, Golden, Colorado.
- _____. 1986. RCRA Part B Operating Permit Application for USDOE-Rocky Flats Plant. Hazardous and Radioactive Mixed Waste. C07890010526. November 1, 1986. Section E Groundwater Monitoring and Protection.
- USDOE-Rocky Flats Plant. Golden, Colorado. July 21, 1986.
- Torstenfelt, B. 1986. "Migration of the Actinides Thorium, Protactinium, Uranium, Neptunium, Plutonium and Americium in Clay," Radiochimica Acta. Volume 39, 105-112.
- U.S. Environmental Protection Agency. 1983. Hazardous Waste Land Treatment Manual. SW-874.
- ______. 1986. Proposed Guidance on Transuranic Compounds in the Environment. Revised Draft. Evaluating Solid Wastes. Third Edition. SW-846.
- _____. 1986a. Test Methods for Evaluating Solid Wastes. Third Edition. SW-846.
- Assessment. Rapid Assessment of Exposure to Particulate Emmissions from Surface Contamination Sites. February 1985. EPA/600/8-85/002

PAD 904 INTERIM STATUS CLOSURE PLAN

- . 1982. Environmental Criteria and Assessment Office. Air Quality Criteria for Particulate Matter and Sulfur Oxide. December 1982. EPA-600/8-82-029. Vol C.
- Denver Regional Council of Governments (DRCOG). 1969. Urban Storm Drainage Criteria Manual. Vol. 1. Prepared by Wright-McLaughlin Engineers. March (Revised 5/1/84).
- U.S. Soil Conservation Service (SCS). 1977. Procedures for Determining Peak Flows in Colorado. U.S. Department of Agriculture. March.
- Rockwell International. 1987. Remedial Investigation Report for 903 Pad, mound, and East Trenches Areas (Draft). Report prepared for the U.S. Department of Energy, Rocky Flats Plant, Golden, Colorado. 31 December, 11 Volumes.
- U.S. Environmental Protection Agency (EPA). 1986c. Interim Guidance: Dose Limits for Persons Expenses to Transuranium Elements in the General Environment.
- Colorado Department of Health (CDH). 1989a. Meeting with Rocky Flats Plant Personnel, January 13, 1989.
- E. Whiteman (Rockwell International), April 24.
- Hausenbuiller, R.L. 1972. Soil Science Principles and Practices. W.C. Brown Publishing Co.
- Rockwell International. 1989 1988 Annual RCRA Ground Water Monitoring Report for Regulated Units at Rocky Flats Plant. Volume 1 Test and Appendices. 1 March.
- Wedding, Et Al. 1984. Determination of Filtration Efficiency of the S and S Fiber Filter.
- Wedding, J.B., Carney, T.C.. 1978. Determination of Sampling Effectiveness of the Rocky Flats High Volume Sampler and Filtration Efficiency on Micro Sorban-98 Fiber Fluid.
- Schiuler, Schuell. 1982. Innovative Products for Separation Science. Publication Number 500.

PAD 904 INTERIM STATUS CLOSURE PLAN

APPENDIX A

PRODUCTION PROCESS DESCRIPTION FOR PONDCRETE AND SALTCRETE FROM SECTION D OF RCRA PART B PERMIT

NOTE

This appendix consists of information found in the RCRA Part B Permit Application for the Rocky Flats Plant. This information has been updated to accurately reflect the current situation.

Date: December 15, 1987

Revision No. 1.0

Section D

effluent from the third stage clarifier is transferred to Tanks D-826 A and B after passing through a Baker Precoat Pressure Filter, FL-831. This filter accomplishes a final solids separation. Filter backwash is transferred to the Filter Feed Tanks D-824 A and B for treatment as TRU waste.

The radioactivity level in the clarifier effluent holding tanks is sampled to determine whether the solution can be sent to the evaporator feed tank or needs to be returned to Tanks D-804A, B, C, or D for recycling through the decontamination-precipitation system. Flow through the system is regulated by a series of Flow Controllers and Ratio Controllers, which adjust pump speeds and addition of reagents.

D-2c(2)(e) Evaporation Process

The evaporation system consists of a multiple effect steam heated unit which produces condensate water and a concentrated salt solution which is fed to the spray dryer. The process includes the following equipment:

Feed Tank D-827

Feed Pumps P-818A, B

In-line Filters FL-801A, B

Vapor Bodies T-802, T-803, T-804, T-805

Heat Exchangers E806A, B, E-807, E-808, E-809

Circulating Pumps P-819, P-820, P-821, P-822

Condenser E-810

Flash Tanks D-830, D-832, D-876

Date: December 15, 1987 Revision No. 1.0 Section D

Revised 9/28/89

Condensate Tank D-834 Product Water Pumps P-824, P-825 Ejectors J-801, J-803 Ejector Aftercooler E-820 Ejector Condensate Tank D-879 Tower Water Return Pump P-861 Hittate/Analyzer/ Heat Exchanger Descaling Tank D-845 Evaporator Concentrate Storage D-826C Spray Dryer Feed Tank D-878 Feed Pumps P-858A, B Spray Dryer Furnace F-801 Spray Atomizer Spray Drier Drying Chamber W-803 Bag Filter FL-803 HEPA Filter Plenums FL 804A, B Evaporator Effluent Tanks T-808A, B Salt Crete Transfer Tank T-884 Salt Crete Mixing Tanks T-883A, B

o Evaporator Feed

The evaporator feed tank, D-827, receives waste water from Tanks D-801A, B, C; D-802A, B, C; and D-826A and B. The feed solution from Tanks D-801 A, B, and C and D-802 A, B, and C pass through in-line filters FL801A and B before entering D-827. These filters (bucket strainers)

Date: December 15, 1987 Revision No. 1.0 Section D

Revised 9/28/89

are periodically flushed out down a process sink to Sump D-852.

o Multiple Effect Evaporation Process

From the feed tank, the solution is pumped into the first effect of the evaporator through // the //feed // preheater / Heat is transferred to the feed from the steam condensate coming from the first effect heat exchanger. Circulation Pump P-819 continuously circulates the liquid in the first effect by drawing liquid from the bottom of the first effect vapor body (T-802), pumping it through the first effect heat exchanger (E-806A or B), and discharging it near the liquid level in the first effect vapor body. The circulation rate is approximately 20 times the evaporator throughput at the design feed rate. Heat exchanger E-806A or B uses 30 psig steam to heat the first effect liquid. Water which evaporates in the first effect passes through the second effect heat exchanger (E-807) to heat that effect, and is collected in Flash Tank D-830. The partially concentrated liquid remaining in the first effect continuously feeds to the second effect.

The liquid in the second effect circulates in the same manner as in the first effect. The evaporated water from the second effect goes through the third effect heat exchanger to heat that effect and collects in Flash Tank

Date: December 15, 1987 Revision No. 1.0 Section D Revised 9/28/89

D-832. The second effect concentrate continuously feeds the third effect.

The third and fourth effects operate in the same manner. Water which evaporates in the fourth effect condenses in the main surface condenser E-810 and collects in Condensate Tank D-834. The concentrated liquid remaining in the fourth effect is continuously pumped to Tanks D-826C or D-878. The liquid in Tank D-826 C can be transferred either to Tank D-878 or to the Salt Crete mixing station. Tank D-878 feeds the spray dryer system.

Nitric acid, phosphoric acid and water are circulated on the process side of the heat exchangers through the heat exchanger descaling tank, D-845. When the acid is depleted, this tank is drained to Tanks D-807A and B for neutralization, or tanks D-824 A & B.

Two parallel steam ejectors (J-801 and J-803) provide the vacuum necessary to maintain and develop the evaporator pressure profile. The pressures range from approximately 10 psig in the first effect to a vacuum of about 20 in. Hg in the fourth effect. Both ejectors evacuate the system during startup, but only one is used during steady state operation. The exhaust steam from the ejectors condenses in the ejector aftercooler (E-820) by contact with water from Cooling Tower 373. The condensate and tower water drain to Tank D-879 and are pumped back to

Date: December 15, 1987 Revision No. 1.0 Section D Revised 9/28/89

the cooling tower by Pump P-861.

Verification that waste treatment is complete is provided by sampling of the nitrate salt and product water on a weekly basis. Product water is also continuously monitored for conductivity, which is an indication of high dissolved solids or ammonia concentration. High conductivity automatically causes the evaporator effluent to be rerouted back to Tank D-802 A, B, or C or to the evaporator feed tank D-827. The waste sampling and analysis plans provided in Section C address this in more detail.

o Spray Dryer System

The concentrated salt solution (approximately 35 percent dissolved salts) is pumped from Tank D-826C into D-878, the spray dryer feed tank. From there the material is pumped to the spray atomizer by Feed Pumps P-858A and B, via Flow Controller FIC-7877. A pressure relief valve is mounted in the pump discharge line to relieve excess pressure.

CO7890010526

Dryer, W-803.

Date: December 15, 1987

Revision No. 1.0

Section D

The spray atomizer consists of a 25 KW frequency converter set, a high speed motor, and a centrifugal atomizer. The concentrate solution is atomized by the centrifugal atomizer into a hot air stream in the Spray

The spray dryer furnace (F-801) heats air with a combination gas-oil burner which fires directly into the air stream in a horizontal heater shell. Cold air enters at the base of the heater shell tangential to the burner, combines with the flame, and is thoroughly mixed to an even temperature as it passes through the air duct and enters the drying chamber. Natural gas is the normal fuel with fuel oil used as a backup. Combustion products enter directly into the spray dryer air stream.

Heated air from the furnace enters the drying chamber (W-803) through a set of downward vanes concentric with the salt concentrate from the spray machine. Instantaneous drying occurs creating small spherical salt particles suspended in the air stream. The water evaporating from the solution cools the air to maintain an outlet temperature of approximately 140°C.

Date: December 15, 1987 Revision No. 1.0 Section D

Revised 9/28/89

Bag Filter Product Collector FL-803

Gore-Tex, fiberglass impregnated filter house where a series of ploth filter bags separate the salt from the air stream. Pulses of compressed air blow downward through the filter bags to dislodge accumulated salt and drop it to the bottom of the collector. The dry product then passes through a rotary air lock into a receiving transfer tank (T-884) then into two Salt Crete mixing tanks, T-883 A and B. The frequency of the air pulse jet is regulated to maintain the desired operating conditions and pressure drop across the baghouse.

The clean air from the bag filter passes through two High Efficiency Particulate Air (HEPA) filter plenums, FL-804A and B, which remove trace amounts of salt, and is then released to the atmosphere.

o Salt-Crete Operation

Dry salt product from the bag filter is mixed in Tanks T-883 A and B with Portland Cement and either a portion of the concentrated salt solution from Tank D-826 C, domestic water, raw water, or Building 374 effluent water. This cemented product, called Salt Crete, is plywood allowed to set up in *trimple/falperhopera* boxes lined with plastic.

Date: December 15, 1987 Revision No. 1.0 Section D

Revised 9/28/89

D-2d(2) Treatment Facilities

One location has been identified in which hazardous wastes are treated in tanks and an operating permit under RCRA is required. This is in addition to the treatment tanks described as part of the waste treatment system. Following are detailed descriptions of the treatment processes occurring in tanks. Engineering drawings are provided in Appendix D-5.

- D-2d(2)(a) Original Uranium Chip Roaster: Building 444/447
 (Unit 45)

 Deleted See Record of Amendments.
- D-2d(2)(b) New Chip Roaster: Building 444/447 (Unit 46)

 Deleted See Record of Amendments.
- D-2d(2)(c) Electrolyte Recovery Process: Building 460 (Unit 47)

 Deleted. See Record of Amendments.
- D-2d(2)(d) Pond Crete Solidification Process: Building 788 (Unit 48)

The Building 788 sludge thickener and solidification system at the solar pond consists of a Mud Cat pumper with an agitator and a pump on pontoons which pumps the sludge from solar pond 297% into the 25,000-gallon steel Gardner Denver/Stearns Roger thickener tank. A rake enclosed in the base of the tank directs the sludge to a drain at the bottom of the tank. After the settling process is completed (10-12 hours), the liquid is

CO7890010526

Date: December 15, 1987 Revision No. 1.0

Section D

Revised 9/28/89

decanted from the tank back into the pond. The thickener is designed to allow a continuous overflow passing over an adjustable weir and flowing through a 4 in. diameter pipe discharging into Pond 207A. The thickener is vented to the atmosphere.

The sludge is then pumped from the base of the tank by a high steel pressure diaphragm slurry pump through pumps piping to the back end of the steel "pug mill". Table D-11 lists specifications for the thickener and pug mill. A series of surge pins, screw augers and paddle wheels lift and mix the sludge with portland cement, which is fed in from an adjacent silo. The mixed sludge and cement, called Pond Crete, flows over a weir, through a chute and plywood into boxes. The trivally recorded boxes lined with 0.011 inch plastic are filled with Pond Crete, dated, and stored in the Building 788 warehouse. Pond Crete storage is discussed in sections D-1b(2), (g), and (j).

The thickener unit's foundation design is not intended to provide any containment capacity for spill control. Instead, it is designed to have a proper slope and configuration so that the entire thickener content would be allowed to flow back to Pond 207 A in the event of tank leakage or puncture. The foundation is constructed of concrete which is free of cracks and gaps. ***

1/9 / 1/9 /

Date: December 15, 1987 Revision: 1

Section D

TANK INFORMATION TABLE POND CRETE TANKS

TABLE D-11

PERMITTED UNIT NUMBER	48 01	48 02
TANK NUMBER	N/A	N/A
TANK NAME	Thuckener	Pug Hall
BUILDING NUMBER	788	786
DESIGN STANDARDS	ASPE	Commercially avail. equip
MATERIAL OF CONSTRUCTION	Carbon Steel	Carbon Steel
MASTE CONTAINED	Pond water/sludge, pH 11	Thickener bottoms, pH II
CORROSION ALLOWANCE	N/A	N/A
DIMENSIONS (dia x h)	25'0" x 9'6"	12" trough,7'8" long
CAF4CITY (gal)	35,000	90
SHELL THICKNESS	snell 1/4", core 5/16"	1/4"
OPERATING PRESSURE	Ata	Ata
OPERATING TEMPERATURE	And	Anb
DESIGN PRESSURE	N/A	N/A
DESIGN TEMPERATURE	N/A	N/A
MAXIMUM LIQUID LEVEL	7'10"	N/A
SPECIFIC GRAVITY	1.08	1.17
STRUCTURAL SUPPORTS	6 steel channel legs	Structural steel stand
YEAR OF CONSTRUCTION	1984	1994
SEAN TYPE	Full Penetration Butt Weld	Welded and Bolted
PFD DRAWING NUMBER	0-850	D-850
PSID DRAWING HUMBER	D-852	D-852
TANK DRAWING NUMBER	D-851	D-851
FLOOR PLAN DRAWING NUMBER		
SECONDARY CONTAINMENT UNIT	2053	2053

^{* -} horizontal tank (n = length)

Date: December 15, 1987 Revision No. 1.0 Section D Revised 9/26/89

The pond sludge characterization is detailed in Section C, "Waste Characterization and Analysis".

o Additional Temporary Solar Pond Equipment increase the capacity of the Pond Crete production additional equipment has recently purchased. The major pieces of additional equipment concrete mixer typyck and a front end loader. The 80540///1980y receives a transfer of four cubic yards of concentrated pond sludge from the existing thickener. sludge is transferred by an existing pump through a inch diameter line at 25 gpm. /Pyda//dua /battyana cement is then pneumatically transferred to the mixer **YVEX by a portable cement silo and pneumatic transfer The cement and sludge is then mixed by rotating The mixture is then discharged into a lined the mixer. TFF/FIXYFF/IF/IF/FRFN/AIFFNATBFA//INFF//F//I/F plywood box. Diddi/Adi/Gedeux/21/1944/41xt/t/t/t/byd/t/t/t/b/Adi/Adi/4411 ddd/diiddadddi/ii//iykb/i/ii/a//i/iybbibbaid/bbi/

The /#ff front end loader will be used to transfer sludge from the bottom of the solar pond and dump it into a new concrete pumper for transfer to the thickener. The front end loader is also used to move sludge from the shallow end of the pond to the deep end.

APPENDIX B BORING LOGS FOR WELLS IN THE AREA OF PAD 904

Ma Di	Letter	Hatching	Name	
		GW	0	Well graded gravels or gravel-sand mixtures little or no fines
	Gravel and	GP	•	Poorly graded gravels or gravel-sand mixtures little or no fines
Coarse-grained Soils	Gravely Sands	GM		Silty gravels gravel-sand-silt mixtures
ned		GC	•	Clayey gravels gravel-sand-clay mixtures
-gran	Sand and Sandy Soils	SW		Well-graded sands or gravelly sands little or no fines
arse-		SP		Poorly-graded sands or gravelly sands little or no fines
ဦ		SM		Silty sands sand-silt mixtures
		SC		Clayey sands sand-clay mixtures
	Silts and Clays	ML		Inorganic silts and very fine sands rock flour silty or clayey fine sands or clayey silts with slight plasticity
Sorls		CL		Inorganic clays of low to medium plasticity gravelly clays sandy clays silty clays lean clays
ned	(LL < 50)	OL		Organic silts and organic silt-clays of low plasticity
Fine-Gramed Soils	Silts and Clays	мн		Inorganic silts micacious or diatimaceous fine sandy or silty soils elastic soils
		СН		Inorganic clays of high plasticity fat clays
	Highly	ОН	*****	Organic class of medium to high plasticity organic silts
Org	PT		Peat and other highly organic soils	

SAMPLE TYPE

TEST TYPE CHEMICAL

UNIFIED SOIL CLASSIFICATION SYSTEM AND BORING LOG SYMBOLS



80-45.50

BORING LOGS FOR ALLUVIAL WELLS

24-86	4-87
26-86	10-87
33-86	15-87
61-86	44-87

	SALOPLE PRO	PERCENT	ANIMA ANIMA	DEPTE N	WELL OR METER CON-	GRAPHDC LOG	LOG OF BORING No. 24-86 Page 1 of 1 DATE DRILLED: 9/12/86 EQUIPMENT: MOBILE 8-57 DESCRIPTION HSA ELEVATION: 5980.45	
		80	25 20	2			Gravel Yellow-gray (5y 7/2) to light olive gray (5y 5/2), some granitic pebbles, coarse sand and silt with a trace of clay, dry	
		36	2509	3/4-		•	As Above	
		С	200	5			No Recovery	
DRILLING CONRACTOR		100	5050	8- - - - - - - - - - - - - - - - - - -			Claystone Pale olive (10y 6/2) to green gray (5Gy 6/1), silty with some fine-grained sand, claystone contains dark yellow orange (10yr 6/6) iron staining, calcareous pockets along fractures throughout sample, damp	
				13-			Total depth of borehole= 12 FT	
CHK D BY				14- 15- 16-				
HY DATE				17-				
				19- 20	ARY APPLIES ON	LY AT THE	LOCATION AND THE OF DELLING SUBSURFACE	
				PRESENTED	MAY CHANGE A 19 A SEMPLEPICA	T THIS LOC ATTON OF A	ATION WITE THE PASSAGE OF TIME THE DATA CTUAL CONDITIONS ENCOUNTERED	24-86



A

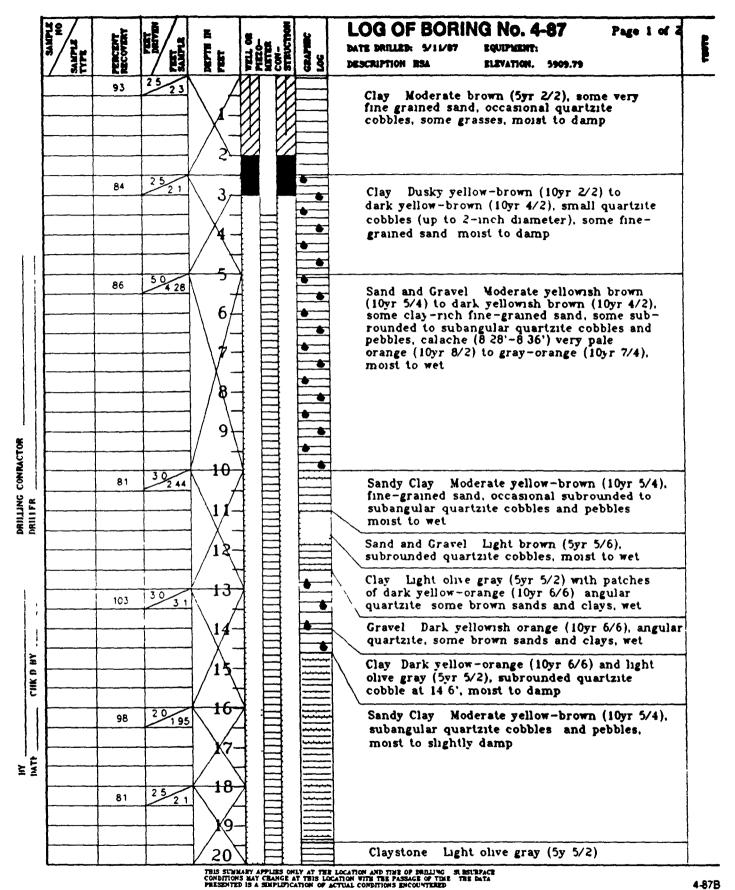
PAD 904 CLOSURE

PROJECT NO 867-10



Boyles Brothers Driffing Co.

CONRACTOR





PROJECT NO XXX-XX

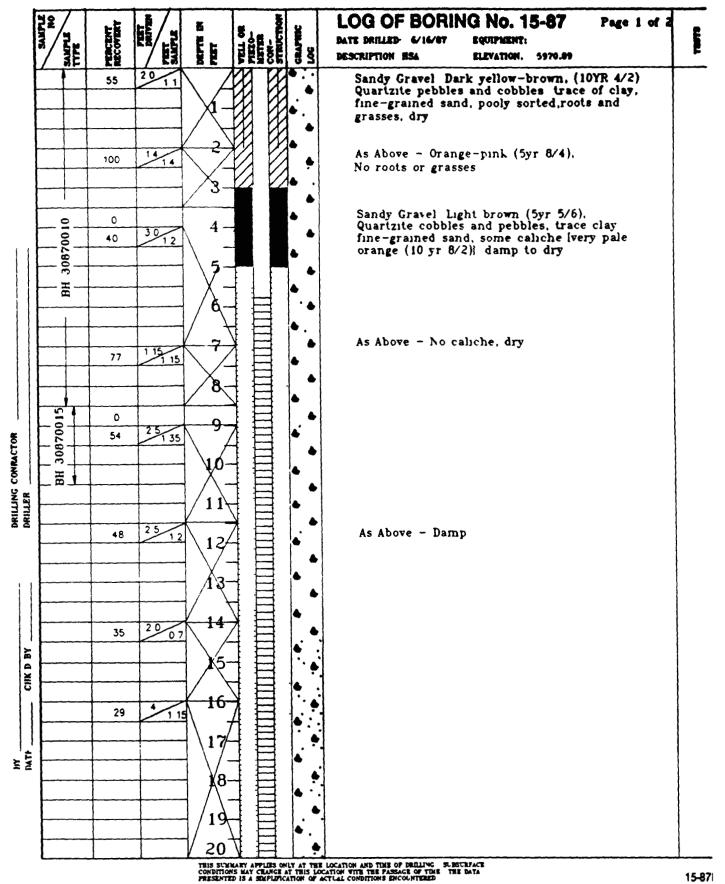
	SALOPLE NO SALOPLE TYPE	MECONER	PERT DELYBE		ALEXO- METER CON- METER CON- STRUCTION	GRAPHIC LOG	LOG OF BORING No. 4-87 Page 2 of 2 BATE DRILLED- 5/11/07 EQUIPMENT: DESCRIPTION HSA ELEVATION: 5909.79	TROTE
-			30,00	78			Claystone Disturbed, weathered, slightly damp	
		83	25	21/			As Above- Dark yellow-orange (10yr 6/6) iron stains, wet at 20 5' to 20 65', damp to slightly moist 21 2' to 22 01' and dry from 22 01' to 23 0'	
ł				/23-				
				24-	,		Total depth of borehole= 23 0'	
				25-				
				26-				
				27-				
				28-				
				29-				
				30-				
				31-				
,				32-				
•				33-				
				34-				
				35-				
				36-				
				37-				
				38-				
				39-	1			
				40	1			
	- -			THIS SUMM CONDITION	ANY APPLIES ONLY S MAY CHANGE AT LIE A SEMPLEFICATION	THIS LOC	LOCATION AND TIME OF DRILLING SUBSURFACE ATION WITE THE PASSACE OF TIME THE DATA CTUAL CONDITIONS ENCOLNYEARD	4-8

PROJECT NO XXX-XX

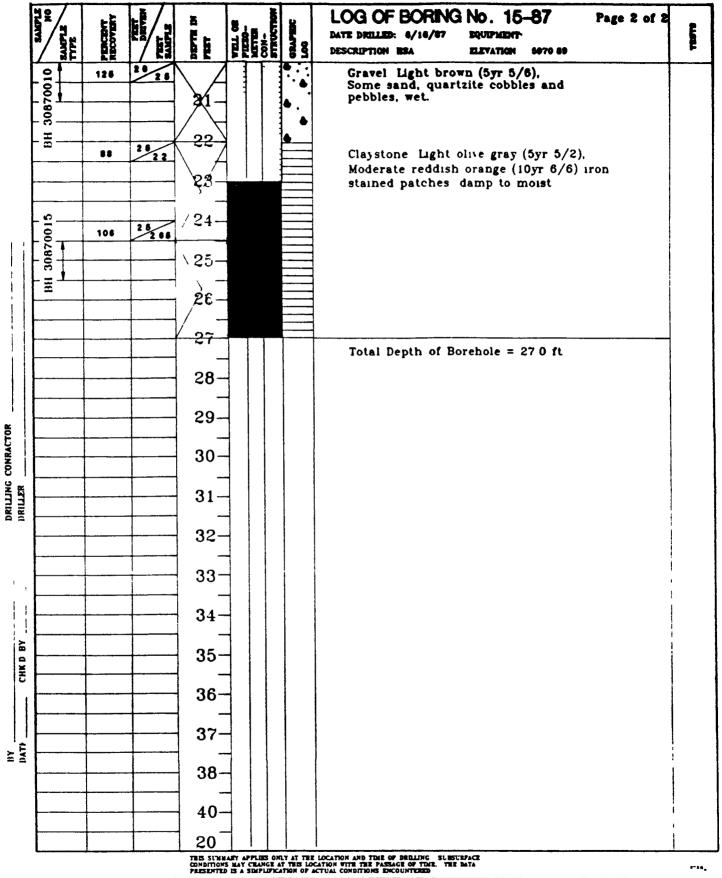


ပိ

Boyles Brothers Drilling

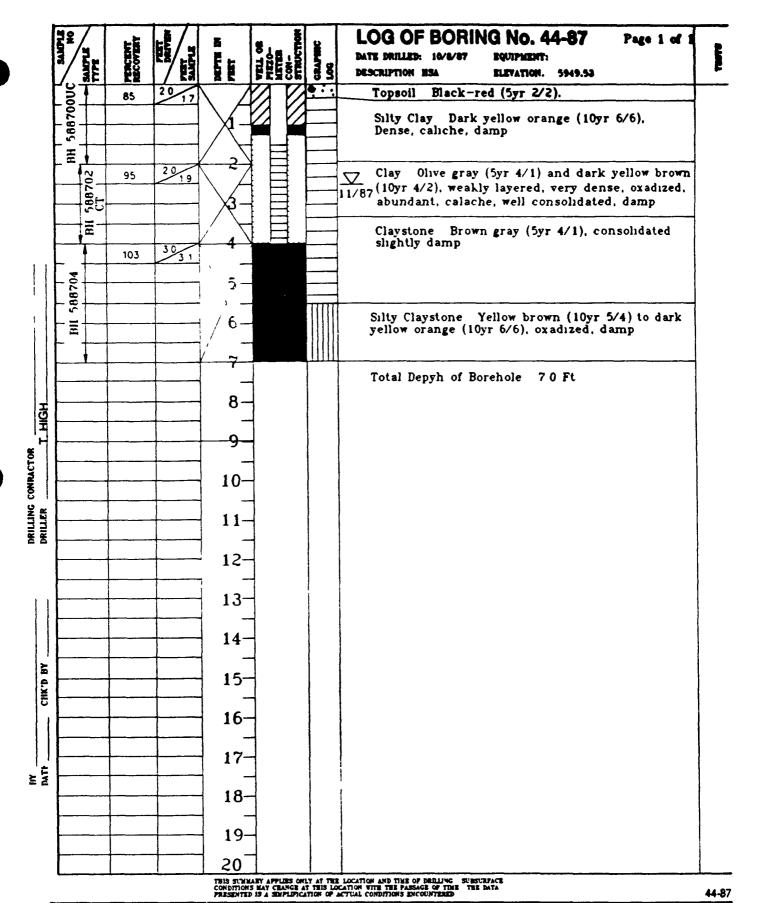








PROJECT NO xxx-xx





PROJECT NO xxx-xx

BORING LOGS FOR BEDROCK WELLS

23-86BR	9-87BR
25-86BR	16-87BR
25-86BR	16-87BR
5-87BR	45-87BR



PROJECT NO 667-10

MECT NO. 883-40



CONKAL 10R

_ 4640



Bayles Brothers fulling ()

CONRACTOR

.. X#

PROJECT NO 867-10



Augies Brothers Drilling (

ROCKY FLATS PLANT PAD 904 CLOSURE

PROJECT NO 667-10

_-968#4



Ξ 12/77/77



..- !**CP***6



Bryles Brethers to Buy (



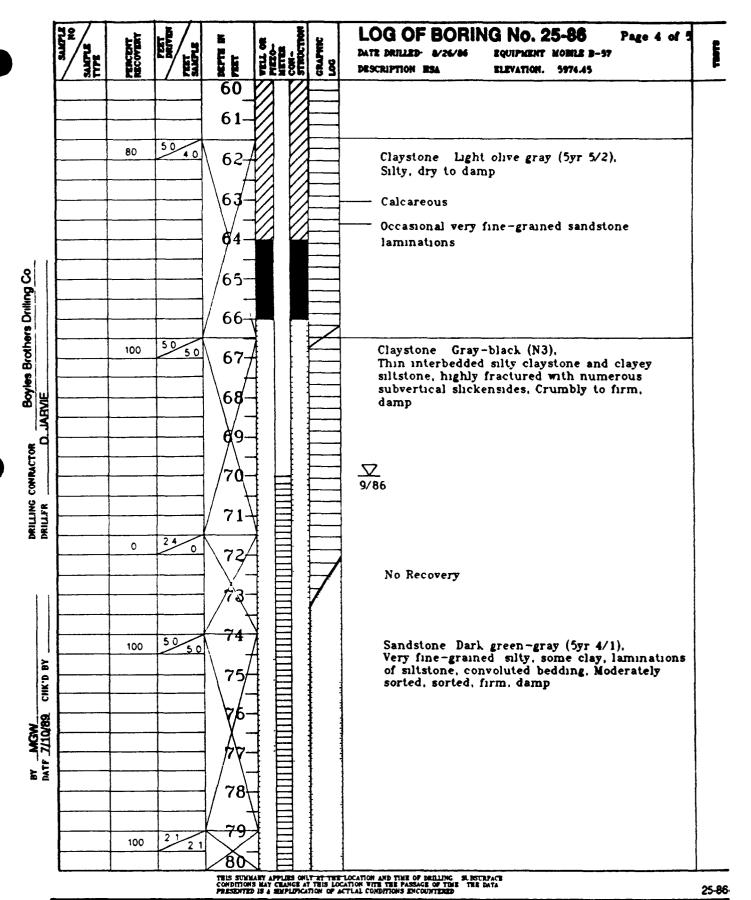
25-86

LOG OF BORING No. 25-86 Page 2 of 5 PERCENT DATE DRILLED- 8/26/86 EQUIPMENT HOBILE B-57 DESCRIPTION HSA BLEVATION 5974.45 20 Claystone Light gray-brown (5yr 6/1), damp 21 As Above - Silty, very wet (cored with water) 23 24 Boyles Brothers Drilling Co 25 26 ARVIE 28 29 DRILLING CONRACTOR 30 31 32 33 34 CHK'D BY 35 36 BY MGW DATE 7/10/89 37 No Recovery THIS SUMMARY APPLIES ONLY AT THE LOCATION AND THE OP DRILLING SUBSURFACE CONDITIONS MAY CRANGE AT THIS LOCATION WITH THE PASSAGE OF THE THE DATA PRESENTED IS A SEMPLEPACATION OF ACTUAL CONDITIONS ENCOUNTERED





PROJECT NO xxx-xx





PROJECT NO xxx-xx

LOG OF BORING No. 25-86 Page 5 of 5 PENCENT DATE DRILLED- 8/26/86 EQUIPMENT: MOBILE B-57 DESCRIPTION HSA ELEVATION: 5974.45 80 81 As Above - some coal lenses, firm, damp 83 94 30 Siltstone Gray-black (N3), with alternating 83 laminations of very fine-grained and sandy siltstone and clayey siltstone, thin very fine-84 grained coal lenses, some convoluted bedding. firm, dry to damp 85 57 86 89 DRILLING CONFACTOR 90 Total Borehole Depth 898 Ft 91-92-93-94-CHK D BY 95 96~ 97-98-99 100 THIS SUMMARY APPLIES ONLY AT THE LOCATION AND TIME OF DETILING SUBSURFACE CONDITIONS MAY PERSONAL OF TIME THE DATA PRESENTED IS A SIMPLIFICATION OF ACTUAL CONDITIONS ENCOL HERED

Boyles Brothers Drilling Co

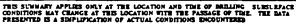
ROCKY FLATS PLANT PAD 904 CLOSURE

PROJECT NO xxx-xx

25-86



PROJECT NO 667-10





Rayles Bruthers for finit Co.



Boyles Brothers Drilling

4.547

VIEL OF PIEZO-METER CON-STRUCTION LOG OF BORING No. 5-87BR PERCENT DEPTE DE Page 4 of 4 007 GRAPHIC DATE DRILLED. 5/22/67 BRUTPHENT- MOBILE 9-67 DESCRIPTION BRA ELEVATION 6027 76 Claystone Same as above 61-Total Depth of Borehole 61 0 ft 62-63-64 65-66-67-68-69-DRILLING CONRACTOR 70-71-72-73-74-1AA 6/22/89 CHA D IN 75-76-77-£ } 78 79

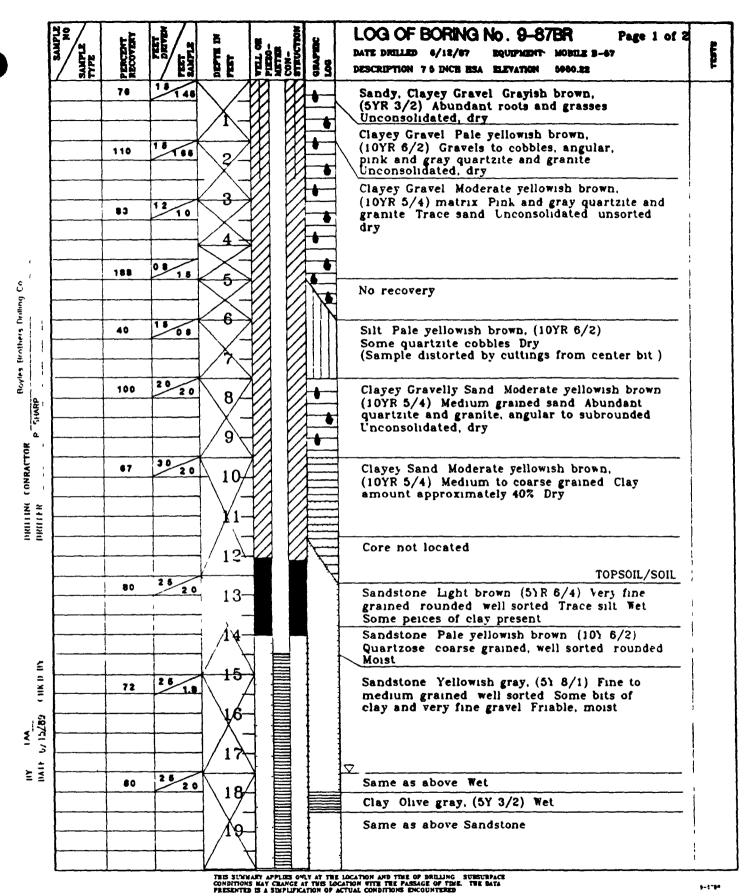
THIS SUMMARY APPLIES ONLY AT THE LOCATION AND TIME OF DEBLING SUBSLEPACE CONDITIONS MAY CRANGE AT THIS LOCATION WITH THE PARSAGE OF TIME. THE DATA PRESENTED IS A SERF-LUTACATION OF ACTICAL CONDITIONS ENCOUNTEED.

1-054



hayte. Brothers Driffing Co.

T MERRITI





PROJECT NO 667-10



T



trelling 50

Bayles Rr

JARVIL

CONKACTOR

THIS SUMMARY APPLIES ONLY AT THE LOCATION AND TIME OF DETLUNG SUBSLEPACE CONDITIONS HAT CHANGE AT THIS LOCATION WITH THE PASSAGE OF TIME. THE DATA PRESENTED IS A SUPPLIFICATION OF ACTUAL CONDITIONS DECOUNTERED.

PROJECT NO 667-10

-5-34



Reothers Ording Co.

ROCKY FLATS PLANT PAD 904 CLOSURE

PROJECT NO 667-10

-- Br-



Hybes Brothers (n lling

ROCKY FLATS PLANT PAD 904 CLOSURE

THE SUMMARY APPLIES ONLY AT THE LOCATION AND TIME OF DERLLING SUBSILIPACE CONDITIONS MAY CHANGE AT THIS LOCATION WITE THE PASSAGE OF TIME. THE DATA PRESENTED IS A SUPPLIFICATION OF ACTUAL CONDITIONS ENCOUNTERED

PROJECT NO 667-10

C- 1-302



Boyles Br. thers (Ir flin) Co.

CONRAC TOR



ROCKY FLATS PLANT PAD 904 CLOSURE

PROJECT NO 667-10

1 1 255





freyle Prothers Drilling Co.

ROCKY FLATS PLANT
PAD 904 CLOSURE

PROJECT NO 667-10

.....



Eryles Prothers (Ir lling)

PROJECT NO 687-10

5 5-5-5



viva file thers for ling Co.

Œ

PROJECT NO 667-10

........



Brothers Drilling

`.

4. 4 36



ž

į

11.5

CONRACTOR



Ş

thers Drilling

ž

ŧ

CONRACTOR

.



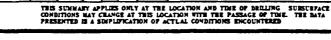
Boyles Brothers Uning 6

CONKACTOR

PROJECT NO 667-10

-- 3A 4

ROCKY FLATS PLANT PAD 904 CLOSURE





Payt s Dr. thers Proffing Co

CONRACTOR



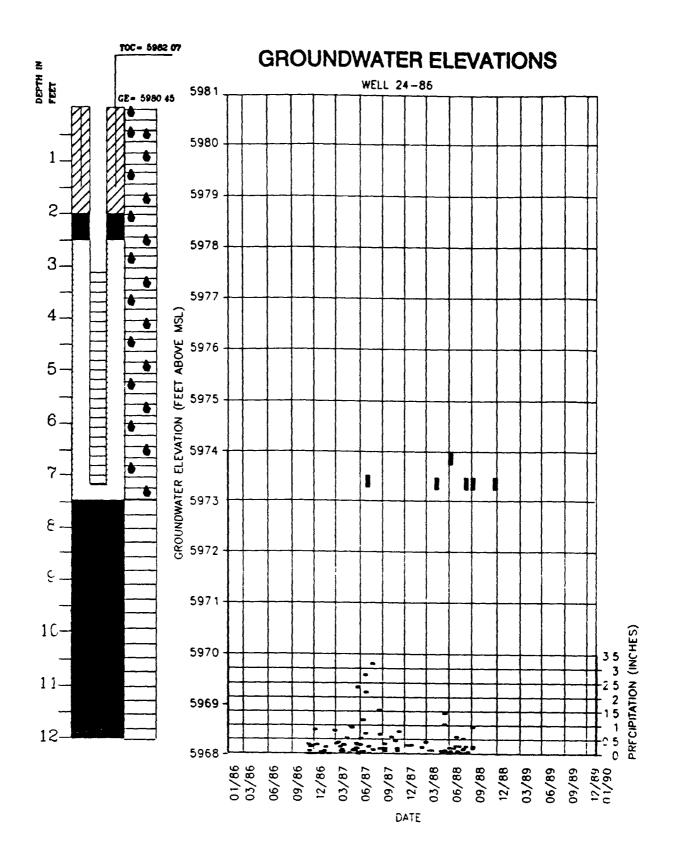
Payles Brothers briting Co

.

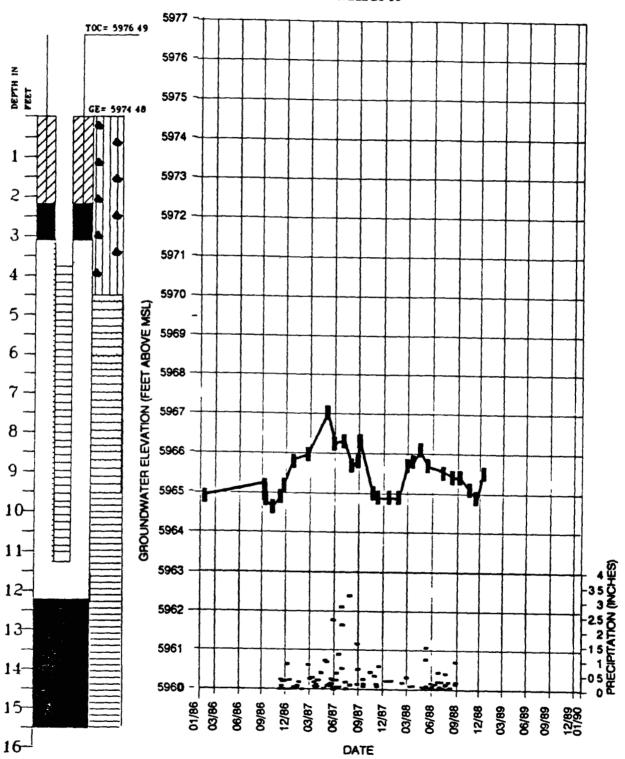
APPENDIX C HYDROGRAPHS FOR WELLS IN THE AREA OF PAD 904

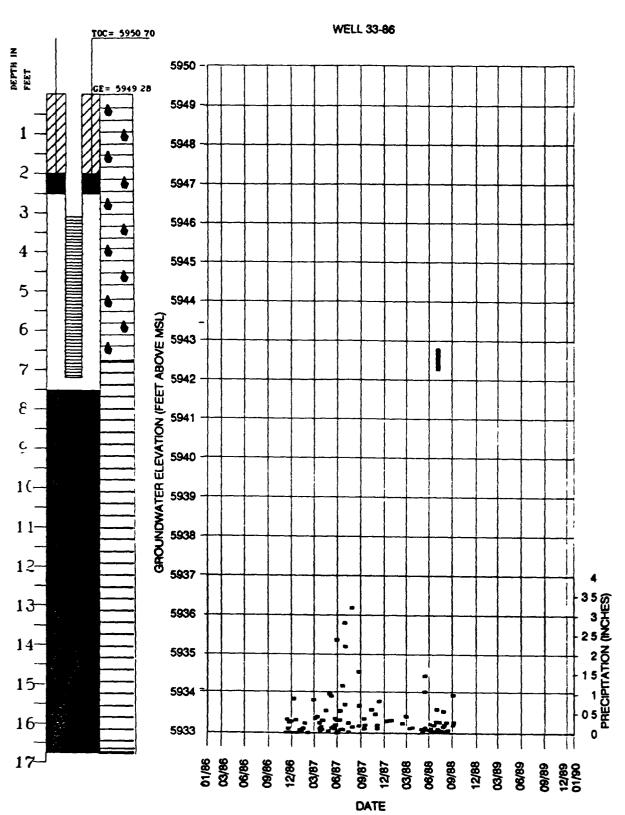
HYDROGRAPHS FOR ALLUVIAL WELLS

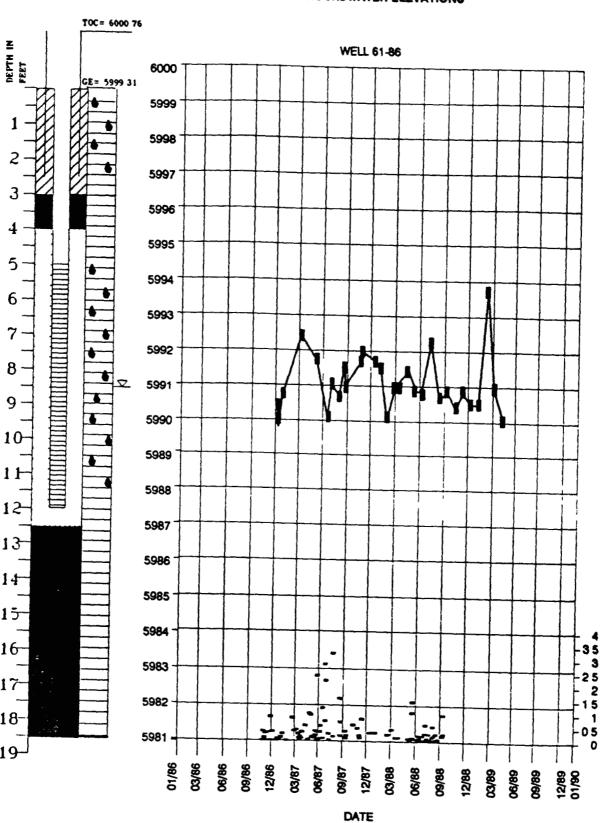
24-86	4-87
26-86	10-87
33-86	15-87
61-86	44-87

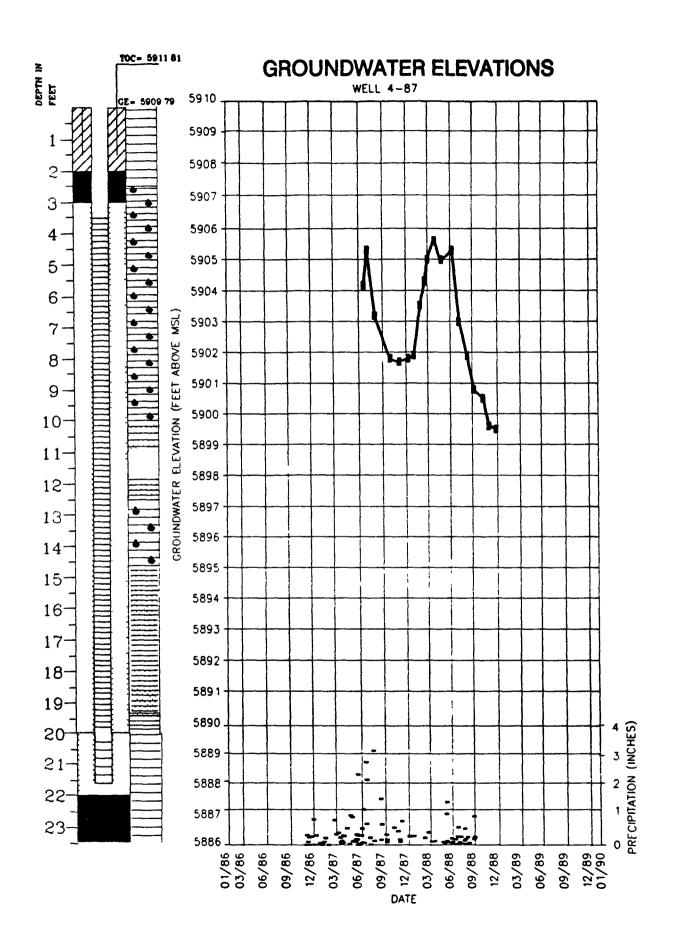


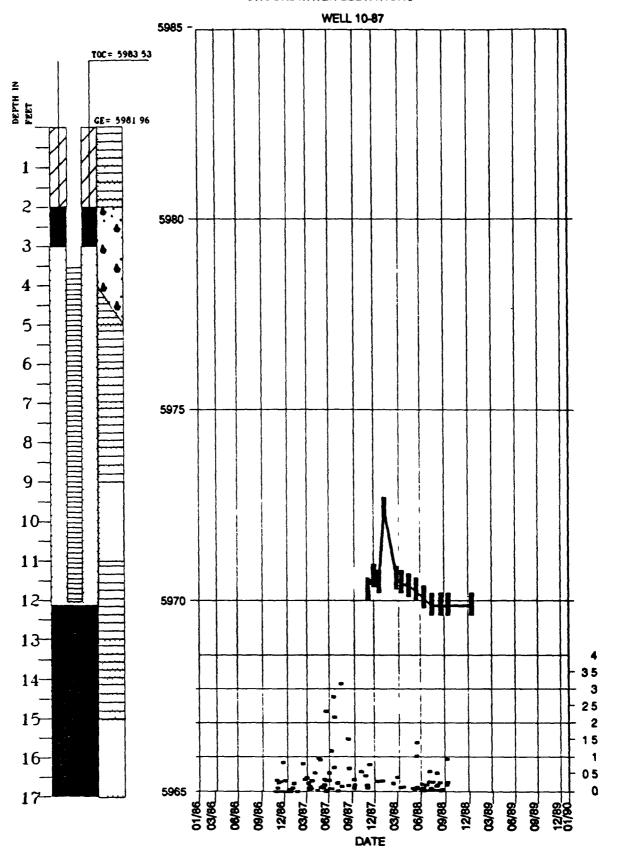
WELL 26-86

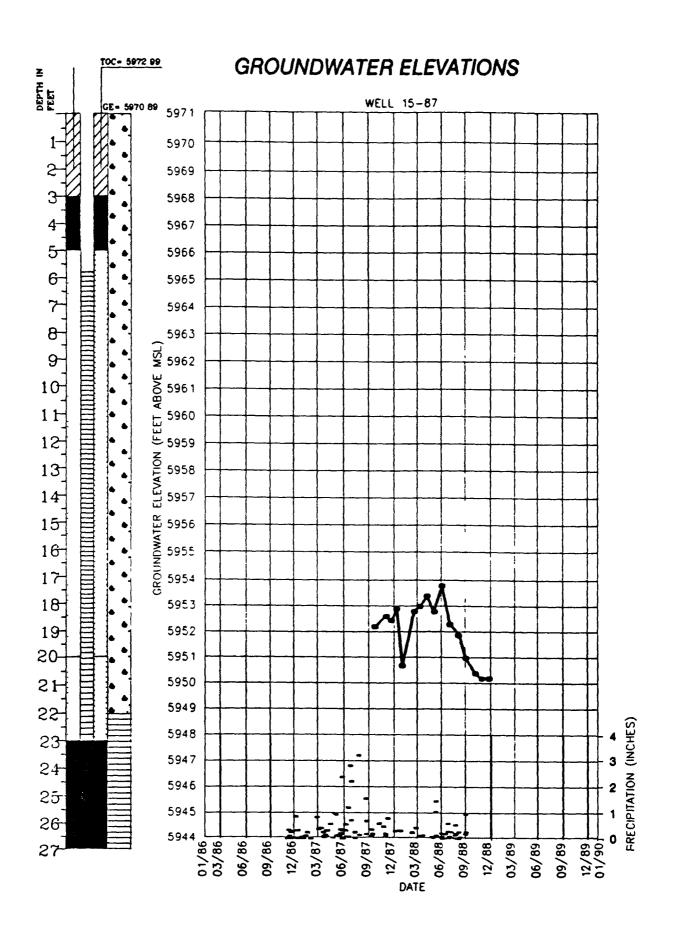


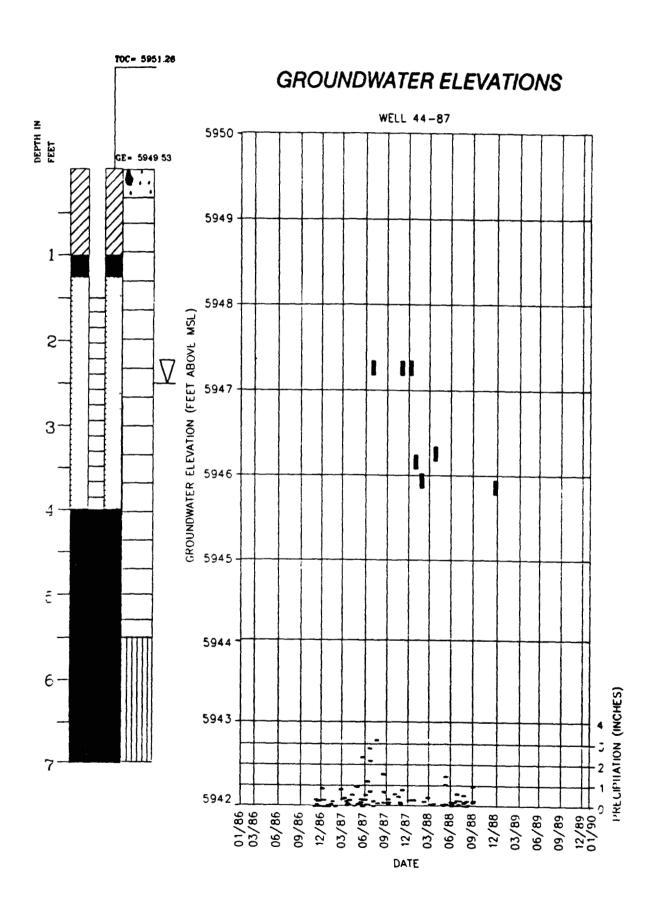












HYDROGRAPHS FOR BEDROCK WELLS

23-86BR

25-86BR

CINCALINE.

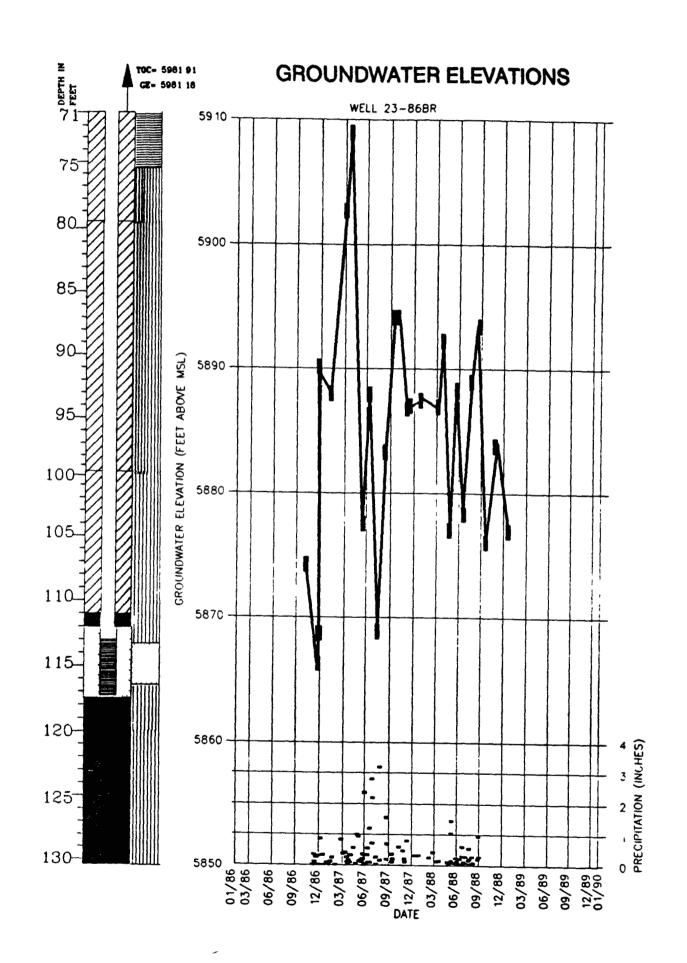
5-87BR

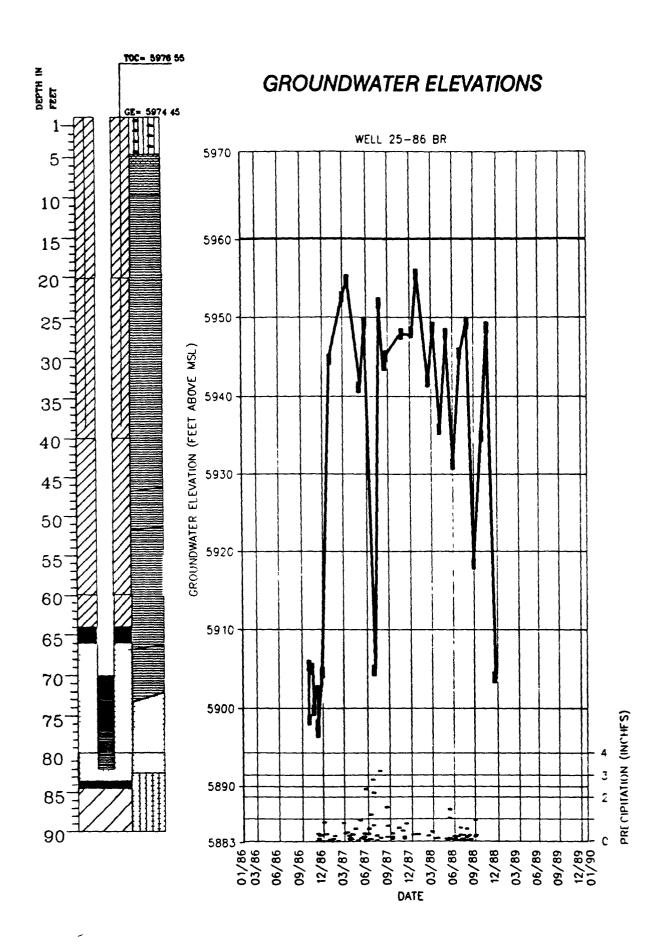
9-87BR

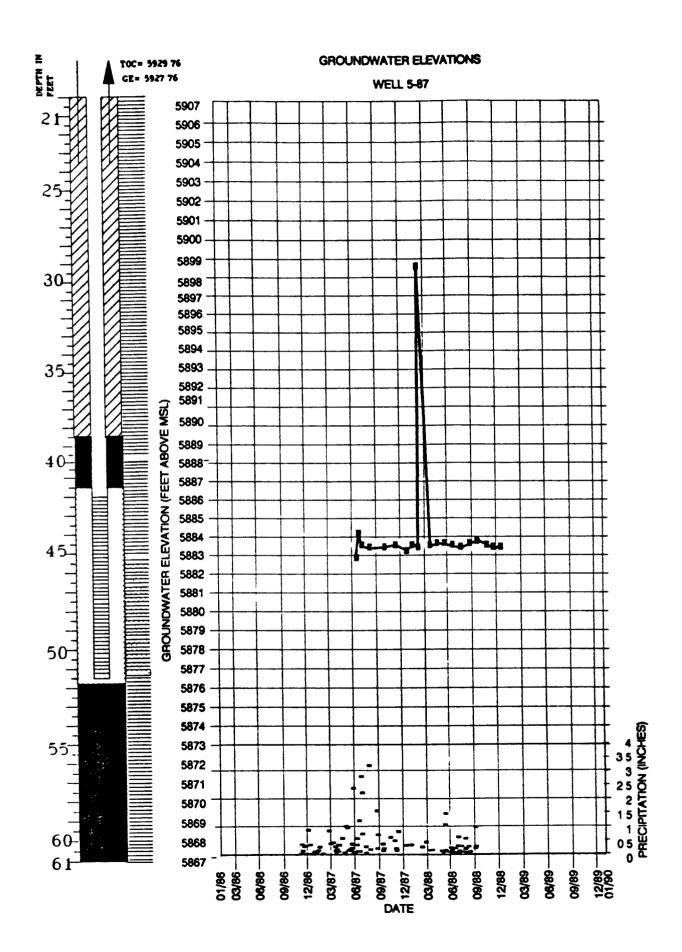
16-87BR

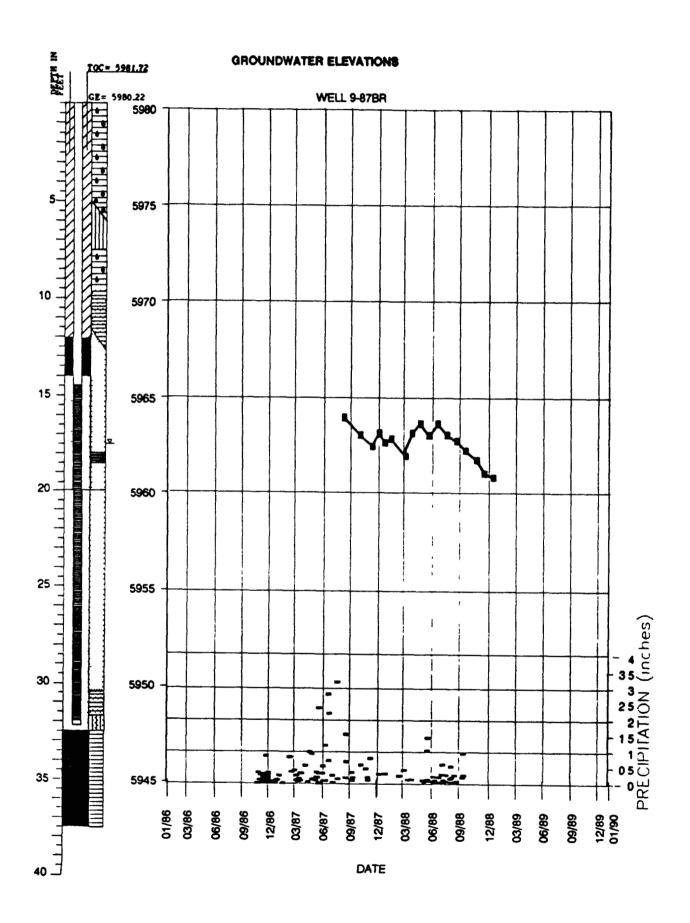
CALAZDAN.

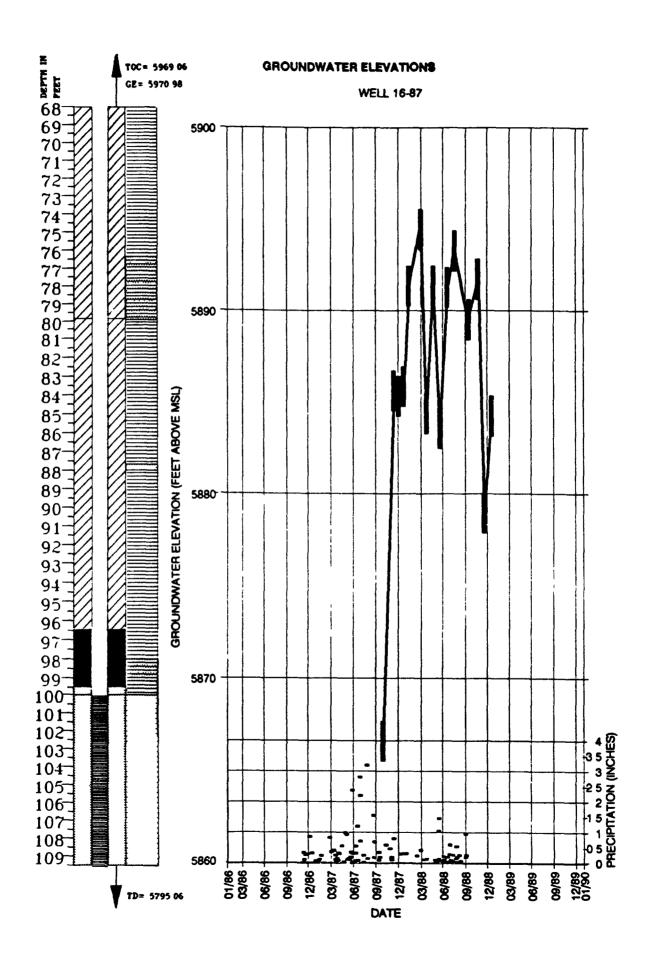
45-87BR

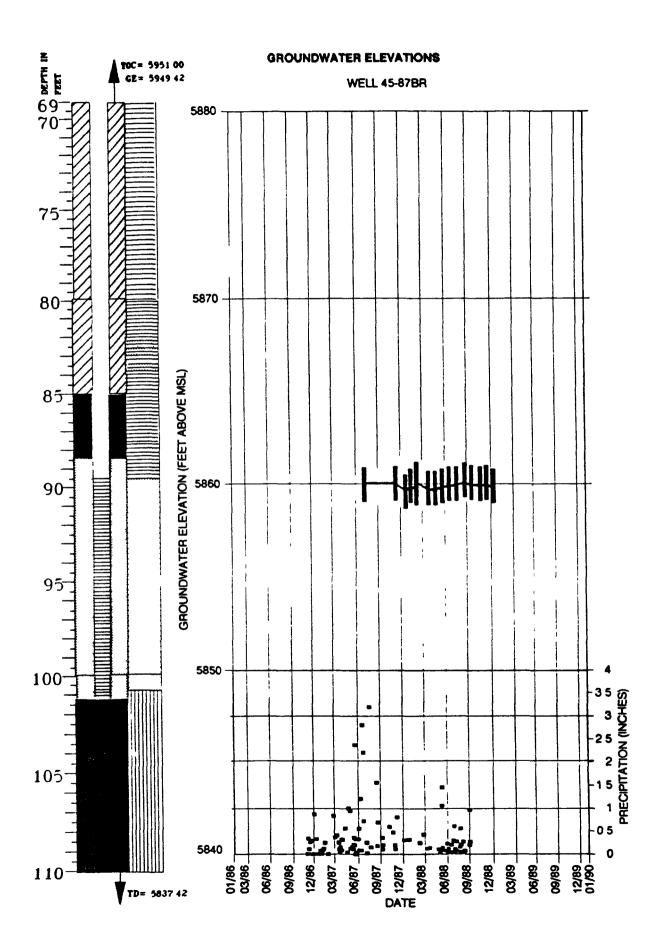












APPENDIX D MONTHLY PONDCRETE STATUS REPORTS



Department of Energy Albuquerque Operations Office P O Box 5400 Albuquerque, New Mexico 87115

-15 31 558

Mr David Shelton
Hazardous Maierials and Waste Management Division
Colorado Department of Health
4210 East 11th Avenue
Denver, Colorado 80220

Dear Mr Shelton

Per Gary Baughman's letter of October 10, 1988, enclosed is the first monthly report describing the progress and activities associated with the repackaging of pondcrete at the Rocky Flats Plant. This report covers activities related to pondcrete for the period of September 10, 1988 through October 20, 1988.

If you have any questions or comments on this report, please refer them to Rich Schassburger of my staff on 966-2762.

Sincerely,

20127- 37 - 3V 21327 - 3 - 3 191

Albert E. Whiteman Area Manager

Enclosure

cc Robert Duprey, EPA Jim Wilson, Rocky Flats Monitoring Council

Status Report For Pondcrete Operations (through October 20, 1988)

- o Building 788 (processing area)
 - Installation of flowmeter completed
 - Thirteen (13) new triwall (cardboard) boxes processed for testing of process control
 - Fourteen (14) plywood boxes (2'x4'x7') filled with triwall boxes (2 triwalls per plywood box) o Ten (10) new triwalls placed into plywood boxes o Eighteen (18) old triwalls placed into plywood boxes
 - Three (3) plywood boxes "capped" with new pondcrete (voids filled)
 - Three (3) destabilized boxes pumped into clarifier (reslurried)
 - Five (5) operators recertified on new processing system
- o Storage Pad 750
 - Inspections ongoing
 - No leaks or spills
- o Storage Pad 904
 - Leaking box identified on 9/19/88
 - Suspect box and two others overpacked into metal waste crate
 - Nine (9) stacks of three-high triwalls restacked to two-high configuration
 - Several leaning stacks shored up with jacks.
 - Inspection ongoing (no new problems)
- o Procedures
 - Quality Assurance Plan Pondcrete Process (WO-4050), new
 - Rework of Triple Walled Pondcrete Boxes (WO-4052), new
 - Packaging and Shipping Solar Pond Sludge (WO-4036); modified
 - Removal of Triple Walled Pondcrete Boxes from the Storage Pads (WO-4053); new
- o Summary reports Attached

SUMMARY REPORT - AUGUST 27 - SEPTEMBER 9, 1988

A status report on pondcrete activities for the period August 27, 1988 through September 9, 1988 is provided. Summary information is included on maintenance activities, waste form testing and the Quality Assurance Plan.

Installation of a process flowmeter is continuing. Pipe fabrication has been completed and approved through NDT of the pieces. Installation of the flowmeter and associated piping is complete; electrical connections and inspection remain to be completed.

Partial results have been received on a matrix experiment to correlate penetrometer readings of solidified pondcrete to ASTM test method D4359-84 and to EPA Paint Filter Test. Water-to-cement ratios in the range of 1 5 to 4 0 were tested on three slurry solids loading levels (15 wt%, 17 5 wt% and 20 wt%). All samples were classified as solids by the EPA Paint Filter Test. The ASTM test has been performed at 17.5 wt% solids and all samples were determined to be solids. Additional ASTM tests at 15 wt% and 20 wt% solids are ongoing.

A Quality Assurance Plan (QAP) for the Pondcrete Process has been written and approved. The QAP incorporates the eighteen elements of NQA-1. Section 9 of the QAP contains the process control requirements to assure that future pondcrete waste forms will be consistently acceptable. Penetrometer testing provides the final acceptance of the waste form.

SUMMARY REPORT - SEPTEMBER 10 - SEPTEMBER 27. 1988

A status report on pondcrete activities for the period September 10, 1988 through September 27, 1988 is provided. Summary information is included on upgrades to the continuous process, UOR status, and design activities.

Upgrades to the centinuous pug-mili mixing process for pondcrete were completed and final inspection approval was made on September 27, 1988. A meter was installed to measure the thickened slurry flow to the pug-mill for determination of approximate water:cement ratios. Quality Plan verification of the system is now scheduled to be conducted through October 5, 1988, and preparation of Qualification and Test Shipment containers will follow.

Actions to satisfy the UOR recommendations have been completed. The pondcrete operators have been recertified to new training requirements. The training qualification standards program includes process description, flowsheet, detailed components and emergency conditions followed by a written test. Also, Nevada Operations has given formal approval, with a minor recommendation, to the "Repackaging and Reprocessing Plan" to complete that UOR recommendation.

Design activities are proceeding on a pondcrete curing facility and reprocessing. A Title II review was held on September 27, 1988, concerning a building at the 904 pad for pondcrete curing. The design concept for reprocessing of unacceptable pondcrete blocks has been finalized. Procurement of a skid-mounted batch mixer has been initiated. An existing concrete pumper will be used to transfer a slurry of unacceptable blocks and water to the batch-mixer. Loading of the concrete pumper will initially be manually performed. The operating history will be used to define additional head-end processing techniques.

SUMMARY REPORT - SEPTEMBER 28 - OCT 12, 1988

This report provides a summary of pondcrete activities for the period September 28, 1988 through October 12, 1988. Information is included on a readiness review meeting and on startup activities.

A readiness review meeting was held on October 5, 1988 to discuss readiness of operational procedures; the status of UOR actions, the fulfillment of DOE/RFAO actions, the status and readiness of the facility, and operational data acquired during flowmeter testing. The significant issues raised during the meeting were: 1) to provide DOE with a copy of all documentation such as operating procedures, inspection procedures, waste form testing data and the OSA and 2) to obtain additional operating data before preparation of the test shipment containers.

Testing was performed on the continuous pug-mill pondcrete process at Building 788 to verify that the process can be controlled to produce an acceptable waste form. A flowmeter has been added for determination of sludge feed rate to the pug-mill. Additionally cement flow from the cement hopper is metered using a constant volume rotary air lock feeder (star valve). The cement flow rate is verified at the beginning of each shift. Test data are shown in the table for the thirteen triwall boxes filled.

Initial testing of six boxes was performed with a target water-to-cement ratio of 2 to 1. Penetrometer testing of the blocks shows that one of the blocks was marginally acceptable, therefore the target water-to-cement ratio was lowered to 1.5 to 1. Production of seven additional boxes to satisfy the readiness review issue indicated that the sludge and cement flows were readily controlled and that penetrometer testing verified good mixtures. The Quality Assurance Plan is being revised to reflect the lower water-to-cement ratio established during these full-scale verification. All procedures and training requirements are in place for the Qualification and Shipment Test Program.

Pondcrete Startup Testing

Penetrometer	comp. Strength	+0006	1000	+0006	+0006	4000	+0006	\ +(
Penet	ned Com	;	1	!	1	1	1	+0006						^
;	Unconfined 48 hrs 72 h	8000	1000	8000	4000	1000	2000	1 6	^	^	^	^	\	+0006
	24 hrs	4000	0	4000	4000	200	2000	1	+0006	+0006	+0006	+0006	+0006	4000
	Actual Water to Cement Ratio	1.8	2.3	1.9	2.0	2.0	1.5	6.0	1.5	1.5	1.4	1.4	1.4	1.6
	Target Water to Cement Ratio	2.0	2.0	2.0	2.0	2.0	2.0	1.5	1.5	1.5	1.5	1.5	1.5	1.5
	Cement Feed Rate (1b/min)	36 + 5		36 + 5	36 + 5	36 + 5	36 ± 5	36 + 5	36 + 5	36 + 5	36 + 5	36 + 5	36 + 5	36 ± 5
	Date - Box	9/28 - 1	9/28 - 2	9/28 - 3	9/28 - 4	9/28 - 5	9/28 - 6	9/30 - 1	10/7 - 1	10/7 - 2	10/7 - 3	10/7 - 4	10/7 - 5	10/6 - 6



Department of Energy

ALBUQUERQUE OPERATIONS ROCKY PLATS AREA OFFICE P O BOX 928 GOLDEN, COLORADO 80402-0828

MOV 29 1968

Mr David C Shelton
Director, Hazardous Materials
and Waste Management Division
Colorado Department of Health
4210 East 11th Avenue
Denver, Colorado 80220

Dear Mr Shelton:

Transmitted herewith is the second status report on the pondcrete operations which were conducted at the U. S. Department of Energy's Rocky Flats Plant from October 12, 1988 through November 17, 1988. The report is being submitted in accordance with the written request from Mr. Gary Baughman of your staff dated October 10, 1988.

Questions concerning the content of the report can be directed to Ms. Candice Jierree of my staff at 966-4888.

Sincerely,

ALST E TEMAN

Albert E Whiteman Area manager

Enclosure

cc w/encl
Robert Duprey, EPA
James Wilson, Rocky Flats Monitoning Council
Tod Anderson, RFAO

STATUS REPORT FOR PONDCRETE OPERATIONS (THROUGH NOVEMBER 20, 1988)

- Building 788 (processing area)
 - Three (3) plywood boxes were "capped" with new pondcrete (voids filled) for shipment test program.
 - Five (5) operators received additional training on new processing system.
 - An additional two (2) new operators are receiving training on pondcrete operations.
 - Five (5) shipment test program boxes were returned, opened and sectioned. Three (3) were repackaged into new plywood boxes.
- Storage Pad 750
 - Inspections ongoing
 - One (1) box of saltcrete released approximately 40 pounds of dry material to the pad. Spilled material was cleaned up and defective box was shipped to Building 374 for reprocessing.
- Storage Pad 904
 - Inspections ongoing
 - No leaks or spills
- Procedures
 - Packaging and Shipping Solar Pond Sludge (WO-4036); retitled to Processing and Immobilization of Solar Pond Sludge.
- Summary Reports Attached

SUMMARY REPORT - OCTOBER 12 - NOVEMBER 1. 1988

This report provides a summary of pondcrete activities for the period October 12, 1988 through November 1, 1988. Information is included on the status of the Qualification and Shipment Test Program.

The Qualification and Shipment Test Program consists of two parts, 1) initial qualification of the immobilization process and 2) test shipment of representative packages. Upon completion of process testing, three plywood boxes containing two each old pondcrete blocks were filled with newly cast pondcrete on October 14 for the qualification test. The new waste form compressive strength was measured by penetrometer on October 17 at greater than 9000 psf. No liquids were observed when the boxes were tipped on edge on October 18. Inspection of the sides and bottom of the waste form on October 19, after the plywood had been stripped, revealed that there were no free liquids in the poncrete matrix. Testing to ASTM Method D4359-84. "Standard Test Method for Determining Whether a Material is a Liquid or a Solid" was conducted on samples taken from each box and all three were classified as solids. These results indicate that the pondcrete process is acceptable for the shipment test program.

The shipment test program will be conducted using: 1) three plywood boxes containing two each, old pondcrete blocks with the void spaces filled with new pondcrete and 2) two boxes containing two each, old pondcrete blocks without the voids filled. The void spaces in three boxes were filled on October 20 with new pondcrete.

The new pondcrete was tested on October 24 and was found to be acceptable with compressive strengths >9000 psf. The ASTM test for liquid/solid determination was run on October 25 and resulted in the samples being classified as solids. Final inspection of the three trial shipment boxes with voids filled and two boxes without voids filled was performed by Traffic and Waste Certification on October 26. The five boxes have been shipped to Building 664 for overpacking and loading into the trailers. The shipment is scheduled for November 7 or November 8, 1988.

SUMMARY REPORT - NOVEMBER 2 - NOVEMBER 17, 1988

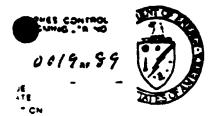
This report provides a summary of pondcrete activities for the period November 2, 1988 through November 17, 1988. Information is included on completion of the Qualification and Shipment Test Program

The Qualification and Shipment Test Program was completed on November 17 with positive results. Results of the qualification portion of this program were discussed in the November 2, 1988 bi-weekly report. The shipment test program was conducted using. 1) three plywood boxes each, containing two old pondcrete blocks with the void spaces filled with new pondcrete, and 2) two boxes each, containing two old pondcrete blocks without the voids filled. Preparation for the shipment test, detailed in the previous summary report, included filling of the void spaces, penetrometer testing and solid/liquid determination using ASTM Method D4359-84 "Standard Test Method for Determining Whether a Material is a Liquid or a Solid."

The plywood boxes were placed into metal overpacks, for the test shipment only, and were loaded into the semi-trailers on November 4 1988. After final inspection of the shipment, the trailers were shipped on November 8 from Rocky Flats Plant to the Nevada Test Site and returned to RFP on November 10, 1988. The trailers were opened on November 11 and no evidence of any problem occurring during transportation was apparent. The overpack containers were opened on November 14 and 15 and the outside surface of the plywood containers was found to be in excellent condition.

The plywood boxes were returned to the pondcrete processing facility for opening and visual inspection. The boxes were opened and then tipped on edge on November 16. Inspection of the sides and bottom of the waste forms on November 17, after the plywood had been stripped, revealed there were no free liquids in the pondcrete matrix. The particulates found are expected to be within criteria limits. Only minor amounts of particulate were found with one exception. One of the blocks in a package without the voids filled experienced some crumbling, primarily into large pieces. The crumbling probably occurred as a result of the inspection procedure when the package was tipped on edge then completely over. All particulate less than approximately one inch was separated, collected, and a representative sample was submitted for particle size analysis.

Results of the Qualification and Shipment Test Program will be finalized and are expected to indicate that all packages performed well in transportation over twice the normal shipping distance. The "Pondcrete Repackaging and Reprocessing Plan" is being finalized to allow for shipment of either 4' x 4' x 7' boxes or 2' x 4' x 7' boxes with or without voids filled.



ALBUQUENQUE OPERATIONS
ROCKY FLATS AREA OFFICE
P O BOX 525
GOLDEN COLORADO 20402-0225

DEC 23 1988

1	_	Ē
3: \$ *	ΞÌ	ž
ANCHINI S.	र्य	Ξ
ADER : P	4	-
Bruac' A.	7	-
-CINTS & A		_
-000 a C		_
DE<60 E ~		-
CINZEP . E	_	_
CIRBY A A	4	_
GETERS SA	4	_
ACECKER . A	-	-
3MANNON W M	-	-
SMITH A E	7	
MESTON WF	덧	
ACZNIAR SO		
TOUNG ER		
		Ļ
	-	-
		-
	-	⊢
86°C=68 3 m		┝
ARNIVAL C.	۳	
RREAL DW		
AMAN LK		
SEAT JL		L
-OEV JB	L	-
KRIEG DW	┡	-
LOUGENBURG GE	⊢	-
MENIMETY E	┢	-
MAINCH ER	7	Ι-
TURNES -L		
VELASCUEL AN		
MICKLANC CE		
	L	L
	-	 -
CORRES CONTROL	┢	 -
Track PM	Ç	۲
acceptant to	۴	†
	Γ	
	Γ	
	L	L
	╀	₽-
	╀	+
	╁	+
	۲	+
	+	+
	T	T
	T	T
	T	T.
	L	1
	L	+
	Τ	1_

Mr David C. Shelton
Director, Hazardous Materials
and Waste Managament Division
Colorado Department of Health
4210 East 11th Avenue
Denver, Colorado 80220

Dear Mr Shelton:

Transmitted herewith is the monthly status report on the pondcrete operations which were conducted at the U.S. Department of Energy's Rocky Flats Plant from November 21, 1988 through December 16, 1988.

Questions concerning the content of the report can be directed to Ms. Candice Jierree of my staff at 966-4888.

Sincerely,

-. -

Aibert E. Whiteman Area Manager

Enclosure

cc w/encl:
Robert Duprey, EPA
James Wilson, Rocky Flats Monitoring Council
Tod Anderson, RFAO

bcc:

→E. R. Naimon, Rockwell P M Amold, Rockwell

Received for Addresses Carres Cantrol RFP

/3/89 EA

.

STATUS REPORT FOR PONDCRETE OPERATIONS (THROUGH DECEMBER 16, 1988)

- Building 788 (processing area)
 - No new pondcrete was produced.
 - Thirty-two (32) acceptable blocks of pondcreta were repackaged into plywood boxes in preparation for the initial shipment to the Nevada Test Site (anticipated during week of December 19).
- Storage Pad 750
 - No leaks or spills
- Storage Pad 904
 - No leaks or spills
 - Approximately 54,000 gallons of precipitation runoff was collected by tanker truck and transported to Building 374 for evaporation.
 - Three (3) protective tarps were retied after loosened by high winds.
- Procedures
 - Procedure, Processing and Immobilization of Solar Pond Sludge (WO-4036), finalized and approved.
- e Summary Report Attached

SUMMARY REPORT - NOVEMBER 21 - DECEMBER 16. 1988

This report provides a summary of pondorete activities for the period November 21, 1988 through December 15, 1988. Information is included on completion of the final audit by DOE/NV prior to authorization to ship pondoreta.

The final pendereta audit (corrective action implementation review) was conducted November 22-30, 1988. The review team consisted of Gene Hamoton, Gene Kendall (REECo), Mark E. Van Der Puy, Darrell M. Warren (DOE/NV), and Richard Sena (DOE/AL). The purpose of the audit was to verify that the Rocky Flats Plant corrective actions are adequate and implemented in an effective and efficient manner. The representatives were given an overview, summary of the test snipment, and a tour of the processing operation and storage pags.

All applicable documentation such as the operating procedure, inspection procedure, wasta packaging procedure, quality assurance plan, traffic procedure and the repackaging and reprocessing plan was presented and discussed to demonstrate compliance with DOT, EPA and DOE regulations and critaria. All issues were resolved and the reviewers recommended to their management final approval of the pondorete wasta form for mixed wasta disposal at the Nevada Test Site. Further conversation with the reviewers indicates that the package has been forwarded for final approval to the DOE/NY Assistant Manager for ESAH and the Nevada Operations Manager.



ALBUQUERQUE OPERATIONS
ACCRY PLATS AREA OPPICE
P 0. BOX 959
GOLDEN, COLORADO 80402-0828
FEB 0 2 1989

Mr David C Shelton, Director Hazardous Materials and Waste Management Division Colorado Department of Health 4210 East 11th Avenue Denver, Colorado 80220

Dear Mr. Shelton:

Enclosed is the monthly status report for pondcrete operations from December 17, 1988 through January 25, 1989 Included is a copy of the summary report generated in that time period and analytical results of water samples from the storage pads.

If you have any questions regarding the content of this report, please refer them to Ms. Candice Jierree of my staff on 966-4888

Sincerely.

Albert E. Whiteman Area Manager

Enclosure

cc w/enci
R.L. Duprey, EPA
G. Dancik, CDH
J. Wilson, Env. Monitoring. Counsel

STATUS REPORT FOR PONDCRETE OPERATIONS (THROUGH JANUARY 25, 1989)

- Building 788 (processing area)
 - No new pondcrete was produced.
 - Forty-four (44) acceptable blocks of pondcrete were repackaged into twenty-two (22) plywood boxes for subsequent shipment to the Nevada Test Site.
- o Storage Pad 750
 - No leaks or spills
 - Ninety-nine (99) unacceptable blocks of pondcrete were overpacked into thirty-three (33) metal boxes and re-stored on the pad.
- o Storage Pad 904
 - No leaks or spills
 - Seventy-eight (78) unacceptable blocks of pondcrete were overpacked into twenty-six (26) metal boxes and re-stored on the pad.
 - Approximately 36,000 gallons of precipitation runoff was collected by tanker truck and transported to Building 374 for evaporation.
 - A new articulating forktruck was received which will allow the safe retrieval of stored pondcrete.
- o Summary Report Attached
- o Runoff Data Attached

SUMMARY REPORT - DECEMBER 17 - JANUARY 25, 1989

This report provides a summary of pondcrete activities for the period December 17, 1988 through January 25, 1989. Information is included on the approval to ship and on the initial routine shipment of pondcrete to the Nevada Test Site.

The Department of Energy Nevada Operations Office approved the acceptance of pondcrete for interim storage at the Nevada Test Site, Area 5 Radioactive Waste Management Site. The approval was granted in a letter from Nick C. Aquilina, NV to Bruce G. Twining, AL, dated December 13, 1988, and in a letter, John G. Themelis, AL/EHD to A. E. Whiteman, RFAO, dated December 16, 1988. Requirements outlined in the Aquilina letter, namely arrangements for payment and for scheduling shipment arrivals to the NTS, have been addressed. Payment for storage of three months of expected shipments was forwarded via overnight delivery on December 16, 1988. Notification of shipment arrivals for all waste shipments to NTS is routinely coordinated between the Rockwell and REECo Traffic Departments.

Twelve plywood boxes (2'x4'x7') were prepared for the initial shipment of pondcrete to NTS. Each box contained two old pondcrete blocks which had been inspected and approved. The voids in the boxes contained solidified pondcrete pieces from the qualification and shipment test program. The twelve packages were loaded into two semi-trailers and were shipped from Rocky Flats Plant on December 21, 1988 and arrived at NTS on December 22, 1988. Activities are ongoing to remove, inspect and repackage stored pondcrete blocks from the pads and to routinely ship to NTS.

904 and 750 PONDCRETE STORAGE AREAS MONITORING DATA

Analytical results from analysis of grab samples collected at the 750 and 904 pondcrete storage areas are summarized below.

Table 1
750 Pad Culvert and Puddle Samples

Sample Date	Nitrate mg/l	Gross Alpha pCi/g	Gross Beta pCi/g
9/07/88	1.55	20 <u>+</u> 22	21 <u>+</u> 27
9/12/88	5.38	7 <u>+</u> 18	42 <u>+</u> 28
9/13/88	5.49	7 <u>+</u> 11	10 <u>+</u> 24
9/13/88	4.82	13 <u>+</u> 16	21 <u>+</u> 25
9/14/88	3.75	5 <u>+</u> 16	14+26
9/21/88	1.56	20 <u>+</u> 15	34 <u>+</u> 25
9/28/88	1.51	55 <u>+</u> 28	17 <u>+</u> 32
10/05/88	1.52	19 <u>+</u> 25	24 <u>+</u> 33
10/06/88	9.51	16 <u>+</u> 13	25 <u>+</u> 25
10/12/88	1.93	5 <u>+</u> 8	8 <u>+</u> 14
10/19/88	1.18	11 <u>+</u> 13	25 <u>+</u> 14
10/26/88	1.23	14±12	16 <u>+</u> 16
11/02/88	1.28	14±13	14 <u>+</u> 18
11/09/88	2.68	5 <u>+</u> 12	2 <u>+</u> 14
11/10/88	4.53	18 <u>+</u> 19	11 <u>+</u> 22
11/15/88	1.06	9 <u>+</u> 12	3 <u>+</u> 17
11/16/88	0.99	11 <u>+</u> 24	5 <u>+</u> 21
11/30/88	1.09	13 <u>+</u> 14	-2 <u>+</u> 12

904 and 750 PONDCRETE STORAGE AREAS MONITORING DATA (continued)

Table 2
904 Pad Pondcrete Monitoring Data

Sample Date	Nitrate mg/l	Gross Alpha pCi/g	Gross Beta pCi/g
9/12/88	14.6	10 <u>+</u> 19	60 <u>+</u> 33
9/14/88	72.6	47 <u>+</u> 20	110+40
9/15/88	••	16 <u>+</u> 12	51 <u>+</u> 30
9/15/88	••	40 <u>+</u> 18	50 <u>+</u> 27
10/06/88	44.3	10 <u>+</u> 15	77 <u>+</u> 30
11/10/88	18.8	14 <u>+</u> 13	51 <u>+</u> 27
11/15/88	7.61	27 <u>+</u> 17	16 <u>+</u> 19

These data were gathered as part of the routine environmental monitoring conducted by the Environmental Management group to screen runoff waters from the pads. It should be noted that these samples may have been taken at either the beginning or end of a precipitation event, with the initial runoff likely containing higher levels of nitrate, alpha and beta.



ALBUQUERQUE OPERATIONS
ROCKY PLATS AREA OFFICE
P Q. BOX 508
GOLDEL COLORADO 80402-0825

MAR 0 1 1989

Mr. David Shelton, Director Hazardous Materials and Waste Management Division Colorado Department of Health 4210 East 11th Avenue Denver, CO 80220

Dear Mr. Shelton:

Transmitted herewith is the monthly status report on the pondcrete operations which were conducted at the U. S. Department of Energy's Rocky Flats Plant from January 26, 1989 through February 23, 1989.

Question concerning the content of the report can be Ms. Candice Jierree of my staff at 966-4888.

Sincerely,
Original State Ley
ALBEST E. L. C. C. C. L.

Albert E. Whiteman Area Manager

Enclosure

cc w/enc:

R. L. Duprey, Dir, Hazardous Mtls & Waste Mgmt Div, EPA, Region VIII

J. Wilson, Rocky Flats Monitoring Council

G. Dansik, CDH

bcc w/enc:

T. Anderson, RFAO

E. R. Naimon, Rockwell

P. M. Arnold, Rockwell

STATUS REPORT FOR PONDCRETE OPERATIONS (JAN 26 THROUGH FEB 23, 1989)

- Building 788 (processing area)
 - No new pondcrete was produced.
 - One hundred sixty-eight (168) acceptable blocks of pondcrete were repackaged into 84 plywood boxes and shipped to the Nevada Test Site.
- Storage Pad 750
 - No leaks or spills
 - One hundred fifty (150) blocks of pondcrete were removed from the pad for shipment to Building 788, inspection and repackaging into plywood crates for shipment to the Nevada Test Site.
- Storage Pad 904
 - No leaks or spills
 - Nine (9) stacks (72 blocks each) of pondcrete were restacked into stacks 4 x 6 x 2 high. Also, from the 9 stacks, 22 metal crates, holding 3 blocks each, were generated and stored on the pad.
 - Approximately 36,000 gallons of precipitation runoff were collected by tanker truck and transported to Building 374 for evaporation.
- Runoff Data Attached

904 and 750 PONDCRETE STORAGE AREAS MONITORING DATA

Analytical results from analysis of grab samples collected at the 750 and 904 pondcrete storage areas are summarized below.

Table 1 750 Pad Culvert

Sample Date	Nitrate mg/l	Gross Alpha pCi/g	Gross Beta pCi/g
12/07/88	1.13	28 ± 14	14 ± 18
12/14/88	1.26	8 <u>+</u> 9	15 ± 13
12/21/88	2.10	11 ± 15	3 <u>+</u> 18
01/04/89	1.54	2 <u>+</u> 9	5 ± 13
01/11/89	1.40	6 <u>+</u> 10	9 ± 14
01/18/89	1.47	23 ± 13	9 ± 13
01/25/89	1.39	49 ± 20	17 ± 14
02/08/89	Source fro	zen, no sample	

Table 2 750 Pad Puddle

Sample Date	Nitrate mg/l	Gross Alpha pCi/g	Gross Beta pCi/g
12/08/88	3.97	27 ± 13	45 ± 16
01/06/89	2.83	5 <u>+</u> 8	15 <u>-</u> 14
01/26/89	4.69	17 ± 11	35 <u>+</u> 16

904 and 750 PONDCRETE STORAGE AREAS MONITORING DATA (continued)

Table 3 904 Pad Puddle

Sample Date	Nitrate mg/l	Gross Alpha pCi/g	Gross Beta pCi/g
12/08/88	2.77	17 ± 10	41 ± 15
12/16/88	1 20	10 ± 11	36 ± 21
01/06/89	2.25	-1 <u>+</u> 7	21 <u>+</u> 14
01/26/89	16.5	13 ± 10	39 <u>+</u> 16

These data were gathered as part of the routine environmental monitoring conducted by the Environmental Management group to screen runoff waters from the pads. Care must be used in any interpretation of these data; the data are derived from grab samples taken in a dynamic system.



ALBUCURACUE OPERATIONS
ROCKY PLATS AREA OPPICS
P.O. BOX 989
GOLDEN, COLORADO 80492-0828

MAR 3 0 1989

Mr David C Shelton, Director
Hazardous Materials and Waste Management Division
Colorado Department of Health
4210 East 11th Avenue
Denver, Colorado 80220

Dear Mr. Shelton:

Transmitted herewith is the monthly stams report on the pondcrete operations which were conducted at the U.S. Department of Energy's Rocky Flats Plant from February 24, 1989 through March 26, 1989.

Questions concerning the content of the report can be directed to Ms. Candice Jierree of my staff at 966-4888.

Sincerely,

(-ALS : Albert E. Whiteman Area Manager

Enclosure

cc w/encl:
R.L. Duprey, EPA
G Dancik, CDH
J. Wilson, Env. Monitoring Counsel

STATUS REPORT FOR PONDCRETE OPERATIONS (FEB 24 THROUGH MAR 26, 1989)

- Building 788 (processing area)
 - No new pondcrete was produced.
 - One hundred ninety-six (196) acceptable blocks of pondcrete were repackaged into 98 plywood boxes and shipped to the Nevada Test Site.
- Storage Pad 750
 - No leaks or spills
 - Two hundred eighty-two (282) blocks of pondcrete were removed from the pad for shipment to Building 788, for inspection.
- Storage Pad 904
 - No leaks or spills
 - Forty-four (44) stacks (72 blocks each) of pondcrete were restacked into smaller stacks and metal crates.
 - Approximately 75,000 gallons of precipitation runoff were collected by tanker truck and transported to Building 374 for evaporation.



ALBUCUSTIQUE OPERATIONS
ROCKY PLATS AREA OFFICE
P G. BOX 988
GOLDEN, COLORADO 80402-0828

MAY 0 2 1989

David C. Shelton, Director
Hazardous Materials & Waste Management Division
Colorado Department of Health
4210 East 11th Avenue
Denver, Colorado 80220

Dear Mr. Shelton:

Please find enclosued the monthly status report on the Rocky Flats Plant pondcrete operations for the period from March 27, 1989 through April 23, 1989.

Please contact Mark E. Van Der Puy, of my staff, at telephone 966-2473 if you have any questions regarding this report.

Sincerely,

Rush O. Inlow

Acong Area Manager

Enclsoure

cc w/encl:

R.L. Duprey, EPA, Region VIII

J. Wilson, RF Env Monstoring Council

G. Dansik, CDH

cc w/o encl:

TW. Anderson, RFAO

E.R. Naimon, Rockwell

PMt. Arnoid, Rockwell

STATUS REPORT FOR PONDCRETE OPERATIONS (MAR 27 THROUGH APR 23, 1989)

- Building 788 (processing area)
 - No new pondcrete was produced.
 - Three hundred sixteen (316) acceptable blocks of pondcrete were repackaged into 158 plywood boxes and shipped to the Nevada Test Site.
- Storage Pad 750
 - On April 7, one tri-wall block of saltcrete was found which had broken open and released approximately one pound of material to the pad. Radioactivity measured on the pad did not exceed background.
- Storage Pad 904
 - No leaks or spills
 - Approximately 45,000 gallons of precipitation runoff were collected by tanker truck and transported to Building 374 for evaporation.
 - Runoff Data Attached

Analytical results from analysis of grab samples collected at the 750 and 904 pondcrete storage areas are summarized below. This report includes all data collected since 1/26/89. The plant guide for nitrate discharges is 10 mg/l; for gross alpha is 40 pCi/l; and for gross beta is 50 pCi/l.

Table 1 750 Pad Culvert

Sample Date	Nitrate	Gross Alpha	Gross Beta
	mg/l	pC1/g	pCi/g
2/15/89	1.66	9 ± 12	19 ± 14
2/22/89	5.90	8 ± 10	16 ± 15
3/01/89	3.57	13 ± 12	41 ± 17
3/08/89	5.41	-2 ± 8	1 ± 16
3/15/89	2.55	5 ± 10	16 ± 16
3/22/89	2.79	4 ± 10	5 ± 15

Table 2
750 Pad Puddle Monitoring Data

Sample Date	Nitrate	Gross Alpha	Gross Beta
	mg/l	pCi/g	pCi/q
2/24/89	87.4	40 ± 18	95 <u>+</u> 22
3/08/89	39.2	2 ± 10	38 + 18
3/21/89	6.13	2 ± 10 2 ± 7	38 ± 18 5 ± 14

Table 3
904 Pad Monitoring Data

Sample Date	Nitrate mg/l	Gross Alpha pCi/q	Gross Beta pCi/q
2/24/89	27.9	16 ± 14	31 ± 17
3/08/89	46.4	2 * 10	49 + 19
3/21/89	16.7	53 <u>∓</u> 18	63 ₹ 21

These data were gathered as part of the routine environmental monitoring conducted by the Environmental Management group to screen runoff waters from the pads. Care must be used in any interpretation of these data; the data are derived from grab samples taken in a dynamic system.



2×222	4	<u>.</u>	
DIST.	5	134	
PRIDJ ACP ACP ACP ACP TZ EA C RC EA EM STA LE 37 WA CTT LF 'CAS GW CATEA LA JUNCAL WH. STON, W.F. SHALE B.D. JUNCAL B.D.	Y	N	7
7 C.7			_
ROT RJ	X	۷	ζ
TZER	X	Ž	ζ
CAC		L	_
EN EM	_	L	_
2878	_	L	_
37 WA		Ļ	_
ELL D	!	ļ.	_
.Es GM	}	ļ.	-
CAEK IA	}	ļ.	-
WCK WE	L	ļ.	,
STON WA	X	₽	7
MERA	┞-	╀	
WERN	╂-	╀	-
	₩	ł	-
	╁╴	╄	-
	╀	╁	
10.40 011	╀	╁	_
O-ER DH	╀	+	-
SEST TE SURVE ON STANK OF	╂╌	t	-
ant art D.M.	÷	+	~
	i -	+	-
X 13	╁	+	-
ALAG GE		t	-
4 91	+	7	-
OH	ĸ	オ	X
	弋	۲	-
AME IL	\mathbf{k}	त	∇
ANCH ER	15	त	\vec{x}
OKMEY ER FORV BL	T	J	_
RNER HIL ELASCUEZ RAL	2	1	_
Elasclez Am	I	J	
	1	1	
	I	_]	
	Ì	_	_



Rocky Flats Plant Aerospace Operations
Rockwell International Corporation PO Box 464 Golden Colorado 80402-0464 (303) 966-7000

Contractor to U.S. Department of Energy

August 30, 1989

89-RF-2996

Edward S. Goldberg Acting Area Manager, RFO

MONTHLY UPDATE ON STATUS OF PONDCRETE OPERATIONS

This information is for the attention of Candice Jierree.

Attached is a status report for pondcrete operations from July 17, 1989 through August 20, 1989. Upon your approval, please forward the report to the Colorado Department of Health. Copies are also to be provided to EPA and the Rocky Flats Environmental Monitoring Council.

If there are any questions concerning the report, please contact me at 966-7900 or Pat Arnold at 966-2056.

F. Weston, Director Plutonium Operations

Orig. and 3 cc - E. S. Goldberg

Enc.

IN REPLY TO LTR. NO.

WINDLEY. WELLEY 45 CONFIDENTIAL

PPROVALS

ORIZ & TYPIST INITIALS

STATUS REPORT FOR PONDCRETE OPERATIONS (JULY 17 THROUGH AUGUST 20, 1989)

- o Building 788 (processing area)
 - One (1) block of rejected pondcrete was processed through the remix facility during startup testing. The resulting waste attained an unconfined compressive strength in excess of 9000 pounds per square foot within 24 hours.
 - Four-hundred sixty-four (464) acceptable blocks of pondcrete were repackaged into two-hundred thirty-two (232) plywood boxes for shipment to the Nevada Test Site (NTS).
 - Two-hundred forty (240) plywood crates were shipped to NTS for disposal.

o Storage Pad 750

- Examination of stored saltcrete is continuing. Eleven (11) boxes of saltcrete were discovered to have leaked approximately fifty (50) pounds of dry material. This material was collected and transferred to Building 374 for processing and the boxes were overpacked into metal crates.

o Storage Pad 904

- Similar examination efforts have revealed one (1) box of saltcrete which has leaked approximately two (2) pounds of dry material.
- Approximately 83,000 gallons of precipitation runoff were collected by tanker truck and transported to Building 374 for evaporation.



ALBUQUERQUE OPERATIONS
ROCKY PLATS AREA OFFICS
P O BOX 928
GOLDEN, COLORADO 80402-0928

AUG 0 2 1989

David C. Shelton, Director
Hazardous Materials & Waste Management Division
Colorado Department of Health
4210 East 11th Avenue
Denver, Colorado 80220

Dear Mr. Shelton:

Transmitted herewith is the monthly status report on the pondcrete operations which were conducted at the U.S. Department of Energy's Rocky Flats Plant from June 26 - July 16, 1989.

Please contact me, or have your staff contact Mark E. Van Der Puy, of my staff, at telephone 966-2473 if you have further questions.

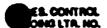
Sincerely,

Comb 1. 1. 1. 1. Edward S. Goldberg Acting Area Manager

Enclosure

cc w/encl: G R. Dancik, CDH R. Duprey, EPA J Wilson, RFMC

cc w/o encl:



19-2583

THASE	-	?
DIST.	Ę	1
HOHML DJ.	V	k
DER, C.P.		L
FUROT RJ.	X	К
MIZER	X	Ų
XXX RE	[-	ŀ
MIZER DOLAG. ELEREM ELEREM	╂╌	┝
ANY, WA MET, IJ. EYERS, QW OECKER, IM 	1	t
JETT. 13.	1	t
EYENS, O.W		T
OFCICE NA	$oldsymbol{\Gamma}$	L
WHOM WAL	L	L
ESTON WI	X	ij
OZNIAK B.D.	₽-	Ļ
OLNG E.A.	╀	ł
	╀	ł
	╁	t
	1	t
ETOER DH.	Γ	Ť
ERRERA DW	\mathbf{I}	Ι
ERRERA DW	1	Г

CARVAN LIK

EBERT JL

OEV, JB

OEV JB

CONTRACT ADMIN.

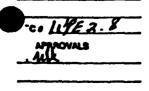
[[Aneld f - X X III]

[In all f - X X III]

CLASSFEATION
UPCLASSFED X
CONFOCHTUL
SECRET
AUTH CLASSFER SIX

00 7/35/89

IN REPLY TO LTR. NO.





Rocky Flats Plant
Aerospace Operations
Rockwell International Corporation
P O Box 464
Golden, Colorado 80402-0464
(303) 966-7000

Contractor to U.S. Department of Energy

July 25, 1989

89-RF-2583

Edward S. Goldberg Acting Area Manager, RFO

MONTHLY UPDATE ON STATUS OF PONDCRETE OPERATIONS

This information is for the attention of Candice Jierree.

Attached is a status report for pondcrete operations from June 26, 1989 through July 16, 1989. Upon your approval, please forward the report to the Colorado Department of Health. Copies are also to be provided to EPA and the Rocky Flats Environmental Monitoring Council.

If there are any questions concerning the report, please contact me at 966-7900 or Pat Arnold at 966-2056.

E. R. Naimon, Manager Waste Operations

Enc. (2)

Orig. and 3 cc - E. S. Goldberg

STATUS REPORT FOR PONDCRETE OPERATIONS (JUNE 26 THROUGH JULY 16, 1989)

- Building 788 (processing area)
 - No new pondcrete was produced.
 - Two-hundred eighty-eight (288) acceptable blocks of pondcrete were repackaged into 144 plywood boxes for shipment to the Nevada Test Site (NTS).
 - One-hundred forty-six (146) plywood crates were shipped to NTS for disposal.

Storage Pad 750

- Examination of stored saltcrete is continuing. Two (2) boxes of saltcrete were discovered to have leaked a total of approximately thirteen (13) pounds of dry material. This material was collected and transferred to Building 374 for processing and the boxes were overpacked into metal crates.

Storage Pad 904

- Similar examination efforts have revealed two (2) boxes of saltcrete which have leaked a total of eleven (11) pounds of dry material.
- Approximately 15,000 gallons of precipitation runoff were collected by tanker truck and transported to Building 374 for evaporation.

Other

- Modifications to the remix facility are nearly complete with startup testing to follow immediately thereafter.

Analytical results from analysis of grab samples collected at the 750 and 904 pondcrete storage areas are summarized below. This report includes all data collected since 05/09/89. The plant guide for nitrate discharges is 10 mg/l; for gross alpha is 40 pCi/l; and for gross beta is 50 pCi/l.

Table 1 750 Pad Culvert

Sample Date	Nitrate	Gross Alpha	Gross Beta
	mg/l	pCi/g	pCi/g
5/17/89	2.48	12 ± 12	7 ± 15
5/24/89	2.38	6 ± 9	32 ± 20
5/31/89	2.25	$ \begin{array}{c} 7 \stackrel{?}{\pm} 11 \\ 16 \stackrel{?}{\pm} 12 \end{array} $	26 ± 22
6/07/89	1.23		-2 ± 16

Table 2
750 Pad Puddle Monitoring Data

Sample Date	Nitrate mg/l	Gross Alpha pCi/g	Gross Beta pCi/g
5/09/89	3.54	19 + 15	49 + 22
5/14/89	2.63	28 + 17	3 + 8
5/16/89	4.08	6 + 11	13 + 18
5/26/89	2.54	24 + 15	11 + 15
5/30/89	3.81	14 + 13	31 + 20
5/31/89	1.79	-1 + 8	11 + 18
6/05/89	28.7	15 + 15	39 + 21
6/22/89	2.12	24 + 16	33 ± 16

Table 3
904 Pad Monitoring Data

Sample Date	Nitrate mg/l	Gross Alpha pC1/g	Gross Beta pCi/g
5/09/89	6.89	21 + 17	69 + 23
5/14/89	3.89	23 + 15	12 + 13
5/16/89	2.22	11 + 12	8 + 17
5/26/89	2.48	7 + 10	21 + 16
5/30/89	6.41	16 + 14	43 + 22
5/31/89	1.93	13 + 13	36 + 22
6/05/89	32.1	15 + 14	57 + 24
6/22/89	24.7	20 ± 15	100 ± 30

These data were gathered as part of the routine environmental monitoring conducted by the Environmental Management group to screen runoff waters from the pads. Care must be used in any interpretation of these data; the data are derived from grab samples taken in a dynamic system.



ALBUQUERQUE OPERATIONS
ROCKY PLATS AREA OFFICE
P O BOX 928
GOLDEN, COLORADO 80402-0828

الله الله

David C Shelton, Director
Hazardous Materials & Waste Management Division
Colorado Department of Health
4210 East 11th Avenue
Denver, Colorado 80220

Dear Mr. Shelton:

Transmitted herewith is the monthly status report on the pondcrete operations which were conducted at the U.S. Department of Energy's Rocky Flats Plant from May 22, 1989 through June 25, 1989. As discussed with Mr. Fred Dowsett, of your staff, leakages associated with salicrete container failures are included in this report. Future leakages will be similarly reported.

Questions concerning the content of the report can be directed to Mark E. Van Der Puy, of my staff, at telephone 966-2473

Sincerely,

for Edward S Goldberg Acting Area Manager

Enclosure

cc w/encl. G R. Dancik, CDH R. Duprey, EPA J. Wilson, RFMC

cc w/o encl: E.R. Naimon, Rockwell P.M. Arnold, Rockwell



89-2196

גוגר

OIST	5	7
NCHINI D J	J	ď
DER C P	~	γ.
FURDT A J	7	
INTZER	4	4
200 A C	4	۴
	Н	-
EKER EM	Н	-
	Щ	-
ABY W A	Н	<u> </u>
CHETT J.F	Ц	⊢
EYERS OW	Н	L
SECKER JH	Н	_
CANADA W.	Н	-
MITHERE.	H	-
ESTON WF	Y	Y
TODISIAN, U.S.	Щ	_
DUNG ER	Ц	L
	Ļ١	L
	Ц	L
		L
ETCHER DH		
LO JAVIMRA		L
ERRERA DW		
MANAM LE		
EBERT JL		
1		
MAN RS		
ANN RL		
OM	L	
WUENBURG GE	Ĺ	L
ACKING EY H B	L	Μ
VAIMON E R	Ы	X.
VEWBY RL	L	L
TURNER H L	L	L
ELASOUEZ R N	L	L
	_	L
	١.	L
	١.	l
CORRES CONTROL	١.,	1.
meld !	Ŋ	15
Y Harrison Land	Ц	14
Helper .	¥	14
Milkeys, F.	Ż	1
Kitchi.	Ľ	Ž.
	L	!
	L	-
	L	-
	L	}
	! -	
	L	—
LASSIFICATION	L	! _
MCLASSIFIED	×	X
ONFIDENTIAL	L	1
ECART	L	l_



Rocky Flats Plant
Aerospace Operations
Rockwell International Corporation
P O Box 464
Golden Colorado 80402-0464

(303) 966-7000

Contractor to U.S. Department of Energy

June 26, 1989

89-RF-2196

Edward S. Goldberg Acting Area Manager DOE, RFAO

MONTHLY UPDATE ON STATUS OF PONDCRETE OPERATIONS

This information is for the attention of Candice Jierree.

Attached is a status report for pondcrete operations from May 22, 1989 through June 25, 1989. Upon your approval, please forward the report to the Colorado Department of Health. Copies are also to be provided to EPA and the Rocky Flats Environmental Monitoring Council.

If there are any questions concerning the report, please contact me at 966-7900 or Pat Arnold at 966-2056.

EL Mainin

E. R. Naimon, Manager Waste Operations

Enc. (2)

Orig. and 3 cc - E. S. Goldberg

VCPII,

IN REPLY TO LTR NO

ME 2.8

STATUS REPORT FOR PONDCRETE OPERATIONS (MAY 22 THROUGH JUNE 25, 1989)

- Building 788 (processing area)
 - No new pondcrete was produced.
 - One hundred eighty-eight (188) acceptable blocks of pondcrete were repackaged into 94 plywood boxes for shipment to the Nevada Test Site (NTS).
 - Eighty-four (84) plywood crates were shipped to NTS for disposal.

o Storage Pad 750

- All of the stored saltcrete is being carefully examined for breached containers which will be repackaged or repaired to minimize further degradation. As a result, nine (9) boxes of stored saltcrete were discovered to have leaked a total of approximately 7.5 pounds of dry material.

o Storage Pad 904

- No leaks or spills.
- Approximately 132,000 gallons of precipitation runoff were collected by tanker truck and transported to Building 374 for evaporation.

o Other

 The reprocessing mixer is in place, with additional modifications to be installed by July. Draft procedures are being prepared.



ALBUQUERQUE OPERATIONS ROCKY PLATS AREA OFFICE P O BOX 928 GOLDEN COLORADO 80402-0828

JUN 0 1 1989

David C Shelton, Director
Hazardous Materials & Waste Management Division
Colorado Department of Health
4210 East 11th Avenue
Denver, Colorado 80220

Dear Mr. Shelton:

Transmitted herewith is the monthly status report on the pondcrete operations which were conducted at the U.S. Department of Energy's Rocky Flats Plant from April 24, 1989 through May 21, 1989.

Questions concerning the content of the report can be directed to Mark E. Van Der Puy, of my staff, at telephone 966-2473.

Sincerely,

Rush O Inlow

Acting Area Manager

Inlow

Enclosure

cc w/encl·

G R. Dancik, CDH

R Duprey, EPA

J. Wilson, RFMC

cc w/o encl:

T. Anderson, RFAO

ER. Naimon, Rockwell

∠P.M. Arnold, Rockwell



89.1395

	٠,	
DIST	•	Ş
J.5.	-	3
ACHINI D J	9	7
DERCP	М	А
	Ы	7
	٦×	0
INTZ E D	X	Δ
>00 R C		_
ERER E H		
MSEN 1 E		
RBY W A		
LINETT JF		
EYERS G W		
DECKER JH		_
MANNON W M		_
ESTON W F	V	₹
OZNIAK OD	~	
JUNG ER	Н	-
	Н	\vdash
	⊢┪	H
	\vdash	\vdash
 -	Н	⊢
	Н	\vdash
ETCHER DH	-	-
	μ.	-
		—
ERRERA DW		L-
ARMAN L K	Ц,	L
77.75		L
10	Ц	L_
WAN RB	_	L
NN AL	١.,	L.
A-u Du	М.	X
DUCENBURG GE		L
MERINLEY E B	ß	LX.
MIMON E R	Ø	区
EMBY AL		L
URNER ML		
ELISOUEZ AN		
	Г	
	7	Γ.
CARES CONTROL	•	١.
Smell P	Y	l X
Angel E	١Ŷ	ΙŦ
Feller F.	1	1
Themen	X	17
THE	V	K
	r	1
	1	†
	1	_
	t	H
	t	†
	t-	H
ASSIFICATION	1	-
ASSIFICATION VCLASSIFIED	b	t
ONFIDENTIAL	ሖ	Æ
	╄	⊢
	 	ı –
AUTH CLASSIFIER	S:G	
WH M	_	
	`	

HAEPLY TOLTH HO

WIE2.8



Aerospace Operations Rockwell International Corporation P O Box 464 Golden Colorado 80402 0464 (303) 966-7000

Rocky Flats Plant

Contractor to U.S. Department of Energy

May 30, 1989

89-RF-1895

Rush O. Inlow Acting Area Manager DOE, RFAO

MONTHLY UPDATE ON STATUS OF PONDCRETE OPERATIONS

This information is for the attention of Candice Jierree.

Attached is a status report for pondcrete operations from April 24, 1989 through May 21, 1989. Upon your approval, please forward the report to the Colorado Department of Health. Copies are also to be provided to EPA and the Rocky Flats Environmental Monitoring Council.

If there are any questions concerning the report, please contact me at 966-7900 or Pat Arnold at 966-2056.

E. R. Naimon, Manager Waste Operations

Enc. (1)

Orig. and 3 cc - R. O. Inlow

STATUS REPORT FOR PONDCRETE OPERATIONS (APR 24 THROUGH MAY 21, 1989)

- o Building 788 (processing area)
 - No new pondcrete was produced.
 - Three hundred thirty-six (336) acceptable blocks of pondcrete were repackaged into 168 plywood boxes and shipped to the Nevada Test Site.
- o Storage Pad 750
 - No leaks or spills.
- o Storage Pad 904
 - No leaks or spills.
 - Approximately 157,000 gallons of precipitation runoff were collected by tanker truck and transported to Building 374 for evaporation

o Other

 Construction activities have begun on the reprocessing facility. The reprocessing scheme involves placing unacceptable pondcrete into a 4.5 cubic yard mixer with Portland cement. Analytical results from analysis of grab samples collected at the 750 and 904 pondcrete storage areas are summarized below. This report includes all data collected for the period March 29, 1989 to May 10, 1989. The plant guide for nitrate discharges is 10 mg/l; for gross alpha is 40 pCi/l; and for gross beta is 50 pCi/l.

Table 1 750 Pad Culvert

Sample Date	Nitrate mg/l	Gross Alpha pCi/g	Gross Beta pCi/g
3/29/89	2.24	17 + 14	11 + 16
4/05/89	2.05	7 + 10	18 + 16
4/12/89	2.44	5 + 9	2 + 16
4/19/89	2.39	-2 + 12	2 + 14
4/26/89	2.17	5 + 12	13 + 22
5/03/89	1.29	9 + 12	11 + 23
5/10/89	2.37	6 ± 11	27 + 22

Table 2
750 Pad Puddle Monitoring Data

Sample Date	Nitrate mg/l	Gross Alpha pCi/g	Gross Beta pCi/g
4/11/89	2.88	-2 <u>+</u> 6	1 ± 14
4/11/89	2.76	11 + 10	14 + 16
5/01/89	3.47	7 I 11	25 + 22

Table 3
904 Pad Monitoring Data

Sample Date	Nitrate	Gross Alpha	Gross Beta
	mg/l	pC1/g	pCi/g
4/11/89	9.6	5 + 9	22 + 16
4/11/89	10.5	5 ± 9	22 ± 16
4/11/89		11 + 11	27 ± 17
5/01/89	5.02	5 - 12	44 + 25

These data were gathered as part of the routine environmental monitoring conducted by the Environmental Management group to screen runoff waters from the pads. Care must be used in any interpretation of these data; the data are derived from grab samples taken in a dynamic system.

Internal Letter



September 18, 1989

TO (Name Organization, internal Address)
K. G. Peter

Waste Processing Bldg 776 No

LMC.LAD

FROM (Name Organization Internal Address Phone)
L. A. Dunstan

Environmental Management

Bldg 250 Ext. 5603

SUBJECT

904 AND 750 PONDCRETE STORAGE AREAS

Analytical results from analysis of grab samples collected at the 750 and 904 pondcrete storage areas are summarized below. This report includes all data collected since 06/15/89. The plant guide for nitrate discharges is 10 mg/l; for gross alpha is 40 pCi/l; and for gross beta is 50 pCi/l.

Table 1 750 Pad Culvert

Sample Date	Nitrate mg/l	Gross Alpha pC1/l	Gross Beta pC1/l
06/15/89	2 75	9 ± 14	19 ± 21
06/21/89	2.44	4 ± 11	-6 + 14
06/28/89	1 90	9 ± 12	-6 ± 18
07/05/89	1.60	10 ± 13	14 + 19
07/12/89	1 53	11 + 13	25 + 18
07/19/89	1.46	11 ± 10	21 ± 19
07/26/89	1.35	8 ± 12	6 + 16
08/02/89	1 85	26 + 15	15 + 17
08/09/89	1.75	6 + 10	1 + 15
08/16/89	1 87	11 + 13	14 + 16
08/23/89	2 29	23 ± 14	19 ± 21

Table 2
750 Pad Puddle Monitoring Data

Sample Date	Nitrate mg/l	Gross Alpha pCi/l	Gross Beta pCi/l
07/12/89	6.34	2 ± 10	19 ± 18
07/31/89	3.84	4 ± 8	27 ± 16
08/07/89	3.76	6 ± 10	13 ± 15
08/08/89	3.77	39 ± 16	26 ± 17

K. G. Peter Page 2 September 18, 1989

Table 3 904 Pad Monitoring Data

Sample Date	Nitrate mg/l	Gross Alpha pCi/l	Gross Beta pCi/l
07/01/89	7.68	18 ± 16	40 ± 21
08/01/89	26.1	11 ± 11	43 ± 18
08/07/89	13 0	27 ± 13	49 ± 19
08/08/89	9 74	20 ± 12	20 ± 17

These data were gathered as part of the routine environmental monitoring conducted by the Environmental Management group to screen runoff waters from the pads Care must be used in any interpretation of these data, the data are derived from grab samples taken in a dynamic system

If you have any questions please call me at extension 5603

L A Dunstan

Environmental Management

L.a. Dunstan

cc: f. D. Hobbs

A. L. Schubert G. H. Setlock

C. L. Sundblad R. H. Zuck

APPENDIX B PAD 904 RUNOFF DATA

904 Pad Puddle Data Sorted by Gross Alpha Activity

Sample	Alpha	Alpha		
Date	pCi/l	Error		
6/10/88	-4	17		
6/15/88	-3	18		
1/6/89	-1	7		
2/1/89	-1	6		
3/3/88	ō	38		
3/8/89	2	10		
8/17/88	4	9		
4/11/89	5	9		
5/1/89	5	12		
Observations	9	Totals	9 Cum. % =	21.3
6/22/88	6	7		
7/19/88	7	10		
5/26/89	7	10		
9/12/88	10	19		
10/6/88	10	15		
12/16/88	10	11		
Observations	6	Totals	15 Cum. % =	36.3
Observacions	J	100415	15 Cum. 4 -	30.3
2/12/88	11	15		
4/11/89	11	11		
5/16/89	11	12		
8/1/89	11	11		
1/31/89	12	10		
1/26/89	13	10		
5/31/89	13	13		
11/10/88	14	13		
6/5/89	15	14		
Observations	9	Totals	24 Cum. % =	58.8
9/15/88	16	12		
2/24/89	16	14		
5/30/89	16	14		
12/8/88	17	10		
7/1/89	18	16		
6/22/89	20	15		
8/8/89	20	12		
Observations	7	Totals	31 Cum. % =	76.3
5/9/89	21	17		
5/14/89	23	15		
Observations	2	Totals	33 Cum. % =	81.3
11/15/00	27	17		
11/15/88	27 27	17		
8/7/89 6/6/88	27 29	13 36		
6/6/88 Observations	29 3	Totals	36 Cum. % =	88.8
ANDET AG LTOHO	•	100019	JU Cum. 7 -	00.0

904 Pad Puddle Data Sorted by Gross Alpha Activity

Sample Date	Alpha pCi/l	Alpha Error		
7/22/88	32	26		
Observations	1	Totals	37 Cum. % =	91.3
9/15/88	40	18		
Observations	1	Totals	38 Cum. % =	93.8
9/14/88	47	20		
Observations	1	Totals	39 Cum. \ =	96.3
3/21/89	53	18		
Observations	1	Totals	40 Cum. 2 =	98.8

904 Pad Puddle Data Sorted by Gross Beta Activity

Date pci/l Error 3/3/88	Sample	Beta	Beta		
3/3/88 0 47 8/17/88 3 23 2/1/89 3 13 5/16/89 8 17 5/14/89 12 13 11/15/88 16 19 8/8/89 20 17 Observations 7 Totals 7 Cum. % = 16.3 1/6/89 21 14 5/26/89 21 16 4/11/89 22 16 4/11/89 27 17 2/24/89 31 17 1/31/89 35 15 12/16/88 36 21 5/31/89 36 22 1/26/89 39 16 7/1/89 40 21 Observations 10 Totals 17 Cum. % = 41.3 12/8/88 41 15 5/30/89 43 22 8/1/89 43 18 2/12/88 44 27 5/189 44 25 7/22/88 47 49 3/8/89 49 19 8/7/88 51 30 11/10/88 51 27 6/10/88 52 46 6/22/88 57 14 6/5/89 57 24 6/15/88 59 46 9/12/88 60 33 Observations 13 Totals 33 Cum. % = 81.3					
8/17/88	5-00	F/ -			
8/17/88 3 23 2/1/89 3 13 5/16/89 8 17 5/14/89 12 13 11/15/88 16 19 8/8/89 20 17 Observations 7 Totals 7 Cum. % = 16.3 1/6/89 21 14 5/26/89 21 16 4/11/89 22 16 4/11/89 27 17 2/24/89 31 17 1/31/89 35 15 12/16/88 36 21 5/31/89 36 22 1/26/89 39 16 7/1/89 40 21 Observations 10 Totals 17 Cum. % = 41.3 12/8/88 41 15 5/30/89 43 18 2/12/88 44 27 5/1/89 44 25 7/22/88 47 49 3/8/89 49 19 8/7/89 85 27 9/15/88 51 27 6/10/88 52 46 6/22/88 57 14 6/5/89 57 24 6/15/88 59 46 9/12/88 60 33 Observations 13 Totals 33 Cum. % = 81.3	3/3/88	0	47		
2/1/89		3	23		
5/14/89 12 13 11/15/88 16 19 8/8/89 20 17 Observations 7 Totals 7 Cum. % = 16.3 1/6/89 21 14 5/26/89 21 16 4/11/89 22 16 4/11/89 27 17 2/24/89 31 17 1/31/89 35 15 12/16/88 36 21 5/31/89 36 22 1/26/89 39 16 7/1/89 40 21 Observations 10 Totals 17 Cum. % = 41.3 12/8/88 41 15 5/30/89 43 22 8/1/89 43 18 2/12/88 44 27 5/1/89 40 25 7/22/88 47 49 3/8/89 49 19 8/7/22/88 47 49 3/8/89 49 19 9/15/88 50 27 9/15/88 51 30 11/10/88 51 27 6/10/88 52 46 6/22/88 57 14 6/5/89 57 24 6/15/89 57 24 6/15/88 59 46 9/12/88 60 33 Observations 13 Totals 33 Cum. % = 81.3		3	13		
5/14/89 12 13 11/15/88 16 19 8/8/89 20 17 Observations 7 Totals 7 Cum. % = 16.3 1/6/89 21 14 5/26/89 21 16 4/11/89 22 16 4/11/89 27 17 2/24/89 31 17 1/31/89 35 15 12/16/88 36 21 5/31/89 36 22 1/26/89 39 16 7/1/89 40 21 Observations 10 Totals 17 Cum. % = 41.3 12/8/88 41 15 5/30/89 43 22 8/1/89 43 18 2/12/88 44 27 5/1/89 40 25 7/22/88 47 49 3/8/89 49 19 8/7/22/88 47 49 3/8/89 49 19 9/15/88 50 27 9/15/88 51 30 11/10/88 51 27 6/10/88 52 46 6/22/88 57 14 6/5/89 57 24 6/15/89 57 24 6/15/88 59 46 9/12/88 60 33 Observations 13 Totals 33 Cum. % = 81.3	• •	8	17		
8/8/89 20 17 Observations 7 Totals 7 Cum. % = 16.3 1/6/89 21 14 5/26/89 21 16 4/11/89 22 16 4/11/89 27 17 2/24/89 31 17 1/31/89 35 15 12/16/88 36 21 21 25 27 27 1/26/89 39 16 7/1/89 40 21 21 21 22 22 22 22 22 22 22 22 22 23 22 23 24 24 25 22 24 24 25 22 24 24 25 22 24 24 25 22 24 24 25 22 22 22 24 24 25 22 22 22 22 22 23 22 24 24 25 22 22 22 22 22 22 22 22 22 22 22 22 22 22 22	5/14/89	12	13		
8/8/89 20 17 Observations 7 Totals 7 Cum. % = 16.3 1/6/89 21 14 5/26/89 21 16 4/11/89 22 16 4/11/89 27 17 2/24/89 31 17 1/31/89 35 15 12/16/88 36 21 21 25 27 27 1/26/89 39 16 7/1/89 40 21 21 21 22 22 22 22 22 22 22 22 22 23 22 23 24 24 25 22 24 24 25 22 24 24 25 22 24 24 25 22 24 24 25 22 22 22 24 24 25 22 22 22 22 22 23 22 24 24 25 22 22 22 22 22 22 22 22 22 22 22 22 22 22 22	11/15/88	16	19		
1/6/89 21 14 5/26/89 21 16 4/11/89 22 16 4/11/89 27 17 2/24/89 31 17 1/31/89 35 15 12/16/88 36 21 5/31/89 36 22 1/26/89 39 16 7/1/89 40 21 Observations 10 Totals 17 Cum. % = 41.3 12/8/88 41 15 5/30/89 43 22 8/1/89 43 18 2/12/88 44 27 5/1/89 44 25 7/22/88 47 49 3/8/89 49 19 8/7/89 49 19 8/7/89 49 19 8/7/89 49 19 8/7/89 49 19 8/7/89 49 19 8/7/89 49 19 8/7/88 50 27 9/15/88 51 30 11/10/88 51 27 6/10/88 52 46 6/22/88 57 14 6/5/89 57 24 6/15/88 59 46 9/12/88 60 33 Observations 13 Totals 33 Cum. % = 81.3		20	17		
5/26/89 21 16 4/11/89 22 16 4/11/89 27 17 2/24/89 31 17 1/31/89 35 15 12/16/88 36 21 5/31/89 36 22 1/26/89 39 16 7/1/89 40 21 Observations 10 Totals 17 Cum. % = 41.3 12/8/88 41 15 5/30/89 43 22 8/1/89 43 18 2/12/88 44 27 5/1/89 44 25 7/22/88 47 49 3/8/89 49 19 8/7/89 49 19 8/7/89 49 19 8/7/89 49 19 9/15/88 50 27 9/15/88 51 30 11/10/88 51 27 6/10/88 52 46 6/22/88 57 14 6/5/89 57 24 6/15/88 59 46 9/12/88 60 33 Observations 13 Totals 33 Cum. % = 81.3	Observations	7	Totals	7 Cum. 🖁 =	16.3
5/26/89 21 16 4/11/89 22 16 4/11/89 27 17 2/24/89 31 17 1/31/89 35 15 12/16/88 36 21 5/31/89 36 22 1/26/89 39 16 7/1/89 40 21 Observations 10 Totals 17 Cum. % = 41.3 12/8/88 41 15 5/30/89 43 22 8/1/89 43 18 2/12/88 44 27 5/1/89 44 25 7/22/88 47 49 3/8/89 49 19 8/7/89 49 19 8/7/89 49 19 8/7/89 49 19 9/15/88 50 27 9/15/88 51 30 11/10/88 51 27 6/10/88 52 46 6/22/88 57 14 6/5/89 57 24 6/15/88 59 46 9/12/88 60 33 Observations 13 Totals 33 Cum. % = 81.3					
5/26/89 21 16 4/11/89 22 16 4/11/89 27 17 2/24/89 31 17 1/31/89 35 15 12/16/88 36 21 5/31/89 36 22 1/26/89 39 16 7/1/89 40 21 Observations 10 Totals 17 Cum. % = 41.3 12/8/88 41 15 5/30/89 43 22 8/1/89 43 18 2/12/88 44 27 5/1/89 44 25 7/22/88 47 49 3/8/89 49 19 8/7/89 49 19 8/7/89 49 19 8/7/89 49 19 9/15/88 50 27 9/15/88 51 30 11/10/88 51 27 6/10/88 52 46 6/22/88 57 14 6/5/89 57 24 6/15/88 59 46 9/12/88 60 33 Observations 13 Totals 33 Cum. % = 81.3	1/6/00	21	14		
4/11/89					
4/11/89 27 17 2/24/89 31 17 1/31/89 35 15 12/16/88 36 21 5/31/89 36 22 1/26/89 39 16 7/1/89 40 21 Observations 10 Totals 17 Cum. % = 41.3 12/8/88 41 15 5/30/89 43 22 8/1/89 43 18 2/12/88 44 27 5/1/89 44 25 7/22/88 47 49 3/8/89 49 19 8/7/89 49 19 8/7/89 49 19 9/15/88 51 30 11/10/88 51 27 6/10/88 52 46 6/22/88 57 14 6/5/89 57 24 6/15/88 59 46 9/12/88 60 33 Observations 13 Totals 33 Cum. % = 81.3					
2/24/89 31 17 1/31/89 35 15 12/16/88 36 21 5/31/89 36 22 1/26/89 39 16 7/1/89 40 21 Observations 10 Totals 17 Cum. % = 41.3 12/8/88 41 15 5/30/89 43 22 8/1/89 43 18 2/12/88 44 27 5/1/89 44 25 7/22/88 47 49 3/8/89 49 19 8/7/89 49 19 8/7/89 49 19 9/15/88 51 30 11/10/88 51 27 6/10/88 52 46 6/22/88 57 14 6/5/89 57 24 6/15/88 59 46 9/12/88 60 33 Observations 13 Totals 33 Cum. % = 81.3					
1/31/89					
12/16/88					
5/31/89 36 22 1/26/89 39 16 7/1/89 40 21 Observations 10 Totals 17 Cum. % = 41.3 12/8/88 41 15 5/30/89 43 22 8/1/89 43 18 2/12/88 44 27 5/1/89 44 25 7/22/88 47 49 3/8/89 49 19 8/7/89 49 19 9/15/88 50 27 9/15/88 51 30 11/10/88 51 27 6/10/88 52 46 6/22/88 57 14 6/5/89 57 24 6/15/89 57 24 6/15/88 59 46 9/12/88 60 33 Observations 13 Totals 33 Cum. % = 81.3					
1/26/89 39 16 7/1/89 40 21 Observations 10 Totals 17 Cum. % = 41.3 12/8/88 41 15 5/30/89 43 22 8/1/89 43 18 2/12/88 44 27 5/1/89 44 25 7/22/88 47 49 3/8/89 49 19 8/7/89 49 19 9/15/88 50 27 9/15/88 51 30 11/10/88 51 27 6/10/88 52 46 6/22/88 57 14 6/5/89 57 24 6/15/88 59 46 9/12/88 60 33 Observations 13 Totals 33 Cum. % = 81.3					
7/1/89					
Observations 10 Totals 17 Cum. % = 41.3 12/8/88 41 15 5/30/89 43 22 8/1/89 43 18 2/12/88 44 27 5/1/89 44 25 7/22/88 47 49 3/8/89 49 19 8/7/89 49 19 9/15/88 50 27 9/15/88 51 30 11/10/88 51 27 6/10/88 52 46 6/22/88 57 14 6/5/89 57 24 6/15/88 59 46 9/12/88 60 33 Observations 13 Totals 33 Cum. % = 81.3					
12/8/88 41 15 5/30/89 43 22 8/1/89 43 18 2/12/88 44 27 5/1/89 44 25 7/22/88 47 49 3/8/89 49 19 8/7/89 49 19 9/15/88 50 27 9/15/88 51 30 11/10/88 51 27 6/10/88 52 46 6/22/88 57 14 6/5/89 57 24 6/15/88 59 46 9/12/88 60 33 Observations 13 Totals 33 Cum. % = 81.3				17 Cum. * =	41.3
5/30/89	observacions	10	100415	17 Cum. 0	
5/30/89					
8/1/89					
2/12/88					
5/1/89					
7/22/88					
3/8/89 49 19 8/7/89 49 19 9/15/88 50 27 9/15/88 51 30 11/10/88 51 27 6/10/88 52 46 6/22/88 57 14 6/5/89 57 24 6/15/88 59 46 9/12/88 60 33 Observations 13 Totals 33 Cum. % = 81.3 3/21/89 63 21 5/9/89 69 23 7/19/88 70 27 10/6/88 77 30					
8/7/89 49 19 9/15/88 50 27 9/15/88 51 30 11/10/88 51 27 6/10/88 52 46 6/22/88 57 14 6/5/89 57 24 6/15/88 59 46 9/12/88 60 33 Observations 13 Totals 33 Cum. % = 81.3 3/21/89 63 21 5/9/89 69 23 7/19/88 70 27 10/6/88 77 30	· ·				
9/15/88 50 27 9/15/88 51 30 11/10/88 51 27 6/10/88 52 46 6/22/88 57 14 6/5/89 57 24 6/15/88 59 46 9/12/88 60 33 Observations 13 Totals 33 Cum. % = 81.3 3/21/89 63 21 5/9/89 69 23 7/19/88 70 27 10/6/88 77 30					
9/15/88 51 30 11/10/88 51 27 6/10/88 52 46 6/22/88 57 14 6/5/89 57 24 6/15/88 59 46 9/12/88 60 33 Observations 13 Totals 33 Cum. % = 81.3 3/21/89 63 21 5/9/89 69 23 7/19/88 70 27 10/6/88 77 30					
11/10/88 51 27 6/10/88 52 46 6/22/88 57 14 6/5/89 57 24 6/15/88 59 46 9/12/88 60 33 Observations 13 Totals 33 Cum. % = 81.3 3/21/89 63 21 5/9/89 69 23 7/19/88 70 27 10/6/88 77 30					
6/10/88 52 46 6/22/88 57 14 6/5/89 57 24 6/15/88 59 46 9/12/88 60 33 Observations 13 Totals 33 Cum. % = 81.3 3/21/89 63 21 5/9/89 69 23 7/19/88 70 27 10/6/88 77 30					
6/22/88 57 14 6/5/89 57 24 6/15/88 59 46 9/12/88 60 33 Observations 13 Totals 33 Cum. % = 81.3 3/21/89 63 21 5/9/89 69 23 7/19/88 70 27 10/6/88 77 30					
6/5/89 57 24 6/15/88 59 46 9/12/88 60 33 Observations 13 Totals 33 Cum. % = 81.3 3/21/89 63 21 5/9/89 69 23 7/19/88 70 27 10/6/88 77 30					
6/15/88 59 46 9/12/88 60 33 Observations 13 Totals 33 Cum. % = 81.3 3/21/89 63 21 5/9/89 69 23 7/19/88 70 27 10/6/88 77 30					
9/12/88 60 33 Observations 13 Totals 33 Cum. % = 81.3 3/21/89 63 21 5/9/89 69 23 7/19/88 70 27 10/6/88 77 30					
Observations 13 Totals 33 Cum. % = 81.3 3/21/89 63 21 5/9/89 69 23 7/19/88 70 27 10/6/88 77 30					
3/21/89 63 21 5/9/89 69 23 7/19/88 70 27 10/6/88 77 30				22 2	01.2
5/9/89 69 23 7/19/88 70 27 10/6/88 77 30	Observations	13	TOCAIS	33 Cum. 8 =	91.3
5/9/89 69 23 7/19/88 70 27 10/6/88 77 30					
5/9/89 69 23 7/19/88 70 27 10/6/88 77 30	3/21/89	63	21		
7/19/88 70 27 10/6/88 77 30		69	23		
10/6/88 77 30		70	27		
Observations 4 Totals 37 Cum. % = 91.3	10/6/88	77	30		
	Observations	4	Totals	37 Cum. % =	91.3

904 Pad Puddle Data Sorted by Gross Beta Activity

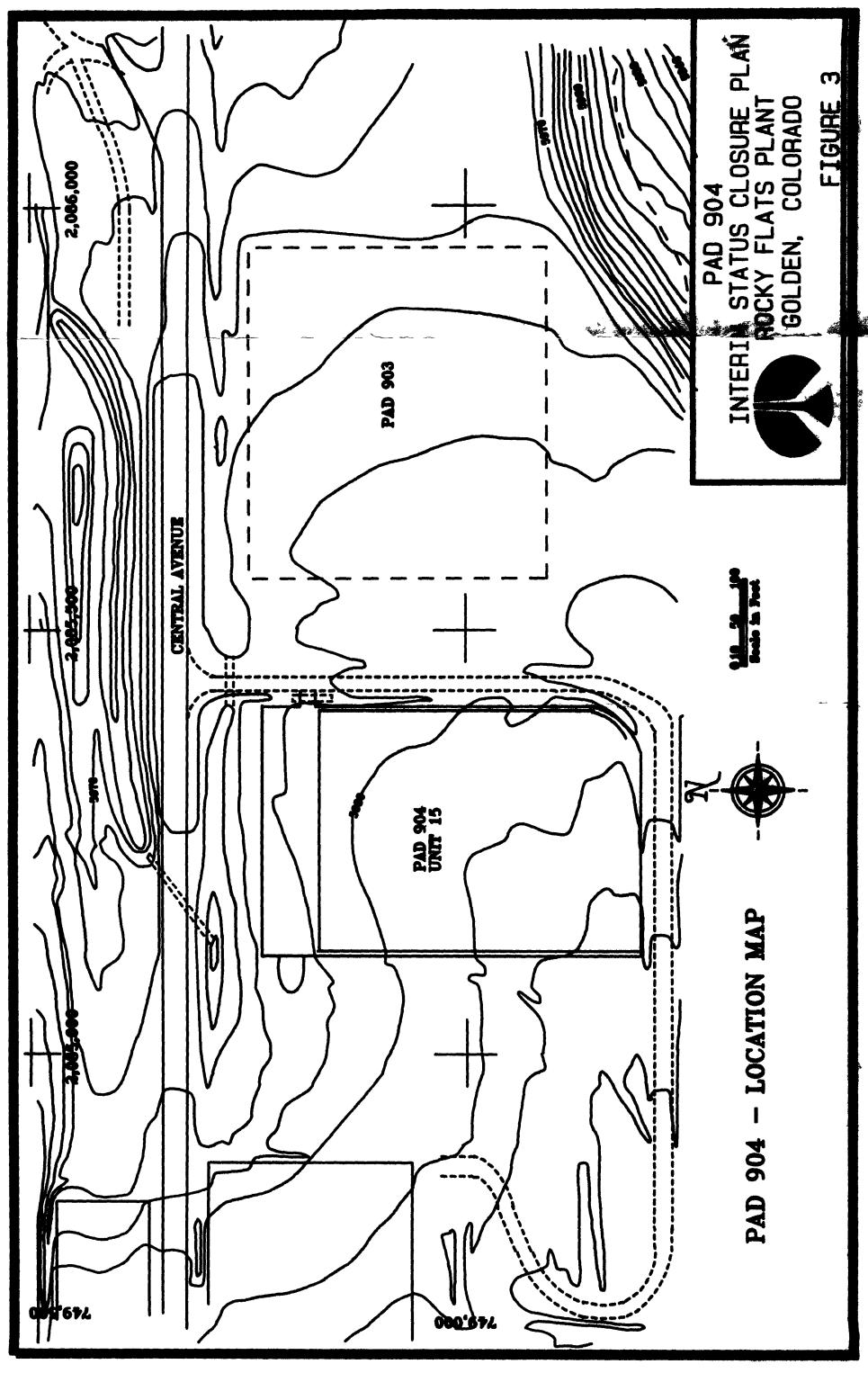
Sample Date	Beta pCi/l	Beta Error		
6/22/89	100	30		
9/14/88	110	40		
Observations	2	Totals	39 Cum. % =	96.3
6/6/88	150	60		
Observations	1	Totals	40 Cum. % =	98.8

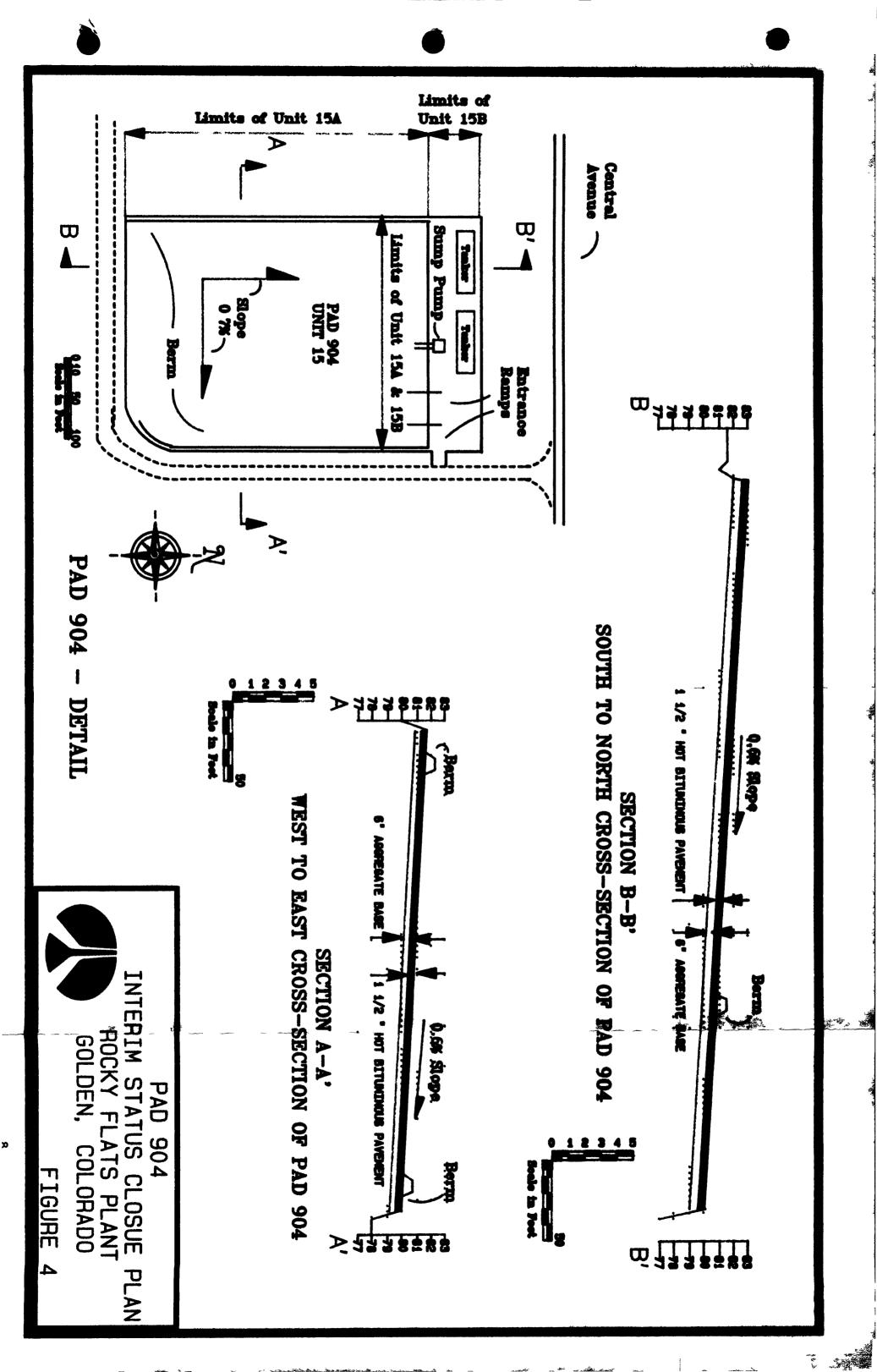
904 Pad Puddle Data Sorted by Nitrate Concentrations

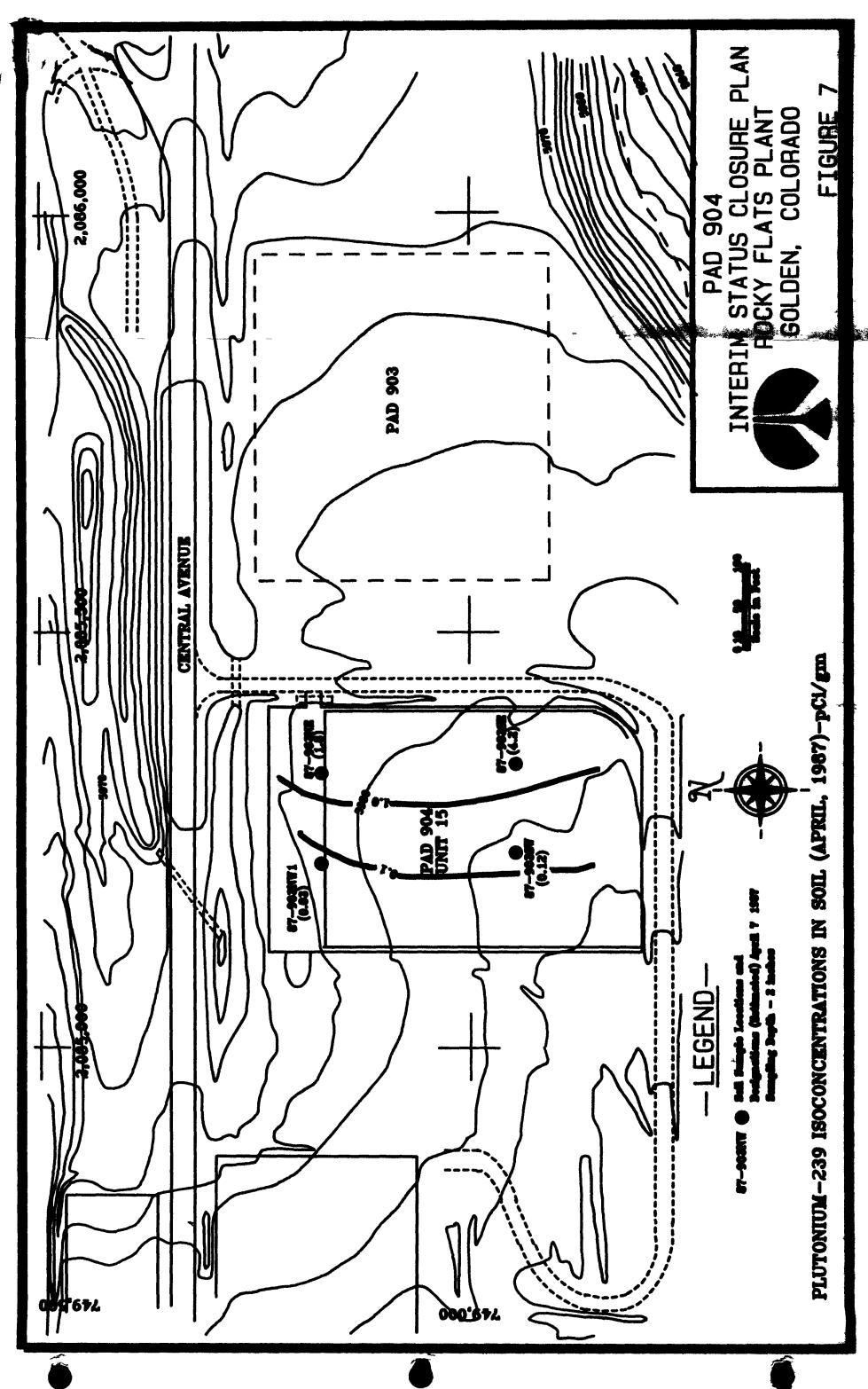
Sam	ole	Nitrate				
Date	•	mg/1				
•	2/88	.08				
•	16/88	1.20				
•	L/89	1.93				
•	5/89	2.22				
3/3/		2.25				
	/89	2.25				
•	5/89	2.48				
	3/88	2.77				
•	9/88	2.97				
2/1/		3.20				
•	1/89	3.89				
•	1/89	4.93				
5/1/		5.02				
•	0/89	6.41				
•	0/89	6.48				
5/9/		6.89				
	15/88	7.61				
7/1/		7.68				
•	1/89	9.60				
•	2/88	9.64				
8/8/		9.74			_	
Observation	ons	21	Totals	21 Cu	m. % =	53.9
4/11	L/89	10.5				
8/7/		13.0				
• •	5/88	13.1				
•	2/88	14.6				
•	5/89	16.5				
<u> </u>	1/89	16.7				
	10/88	18.8				
Observati	•	7	Totals	28 C1	ım. % =	72.4
		•	100415	20 0	234 - 6 -	72.4
6/22	2/89	24.7				
8/1/	.*	26.1				
	0/88	26.3				
	1/89	27.9				
Observati		4	Totals	32 Ct	ım. % =	82.9
6/5/		32.1				
Observati	ions	1	Totals	33 Ct	1m. % =	85.5
30/	. /00	44 4				
	5/88 /80	44.3				
3/8/		46.4	Mak-3-	25 2		00.0
Observati	LONS	2	Totals	35 C1	ım. % =	90.8

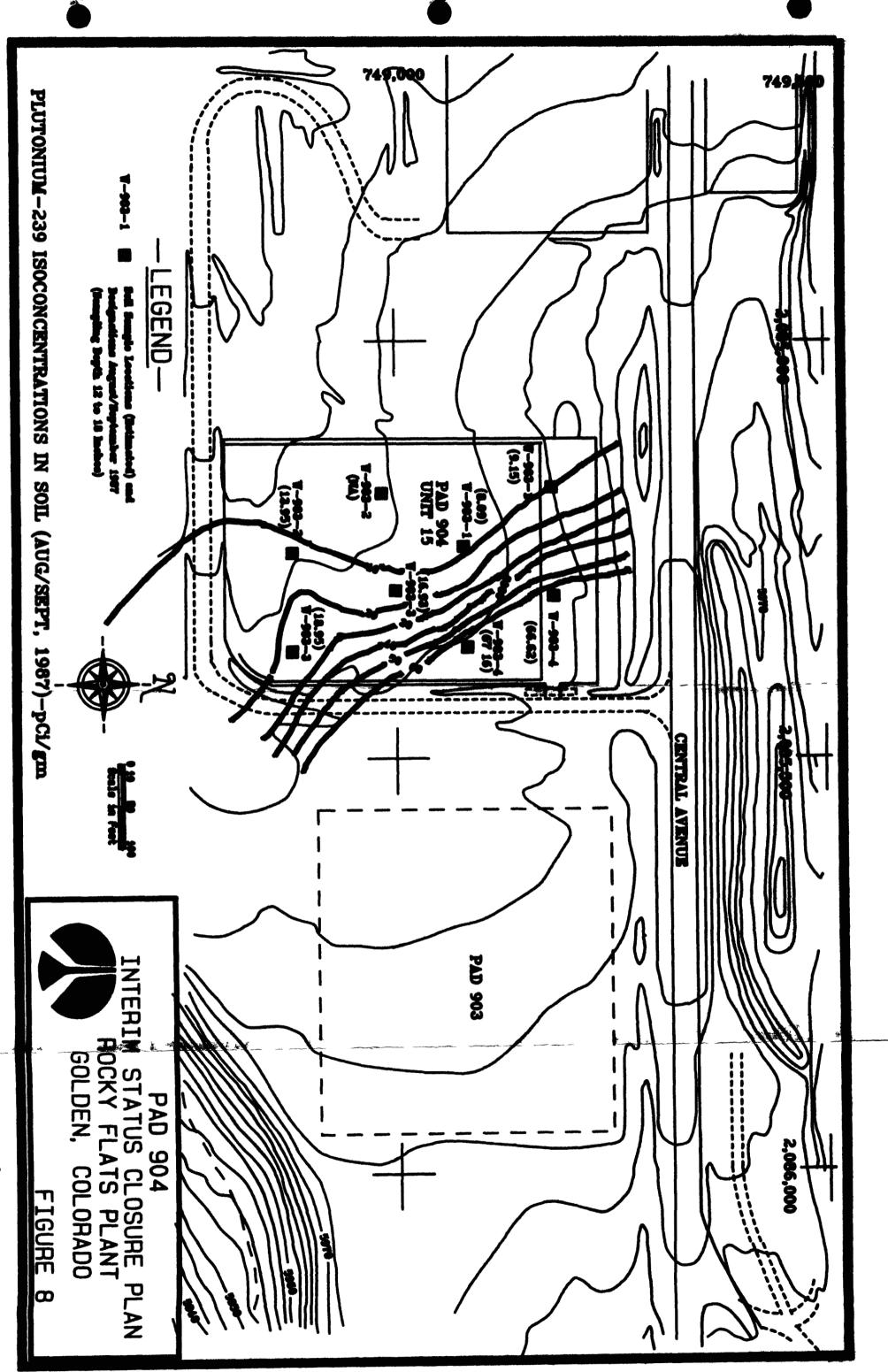
904 Pad Puddle Data Sorted by Nitrate Concentrations

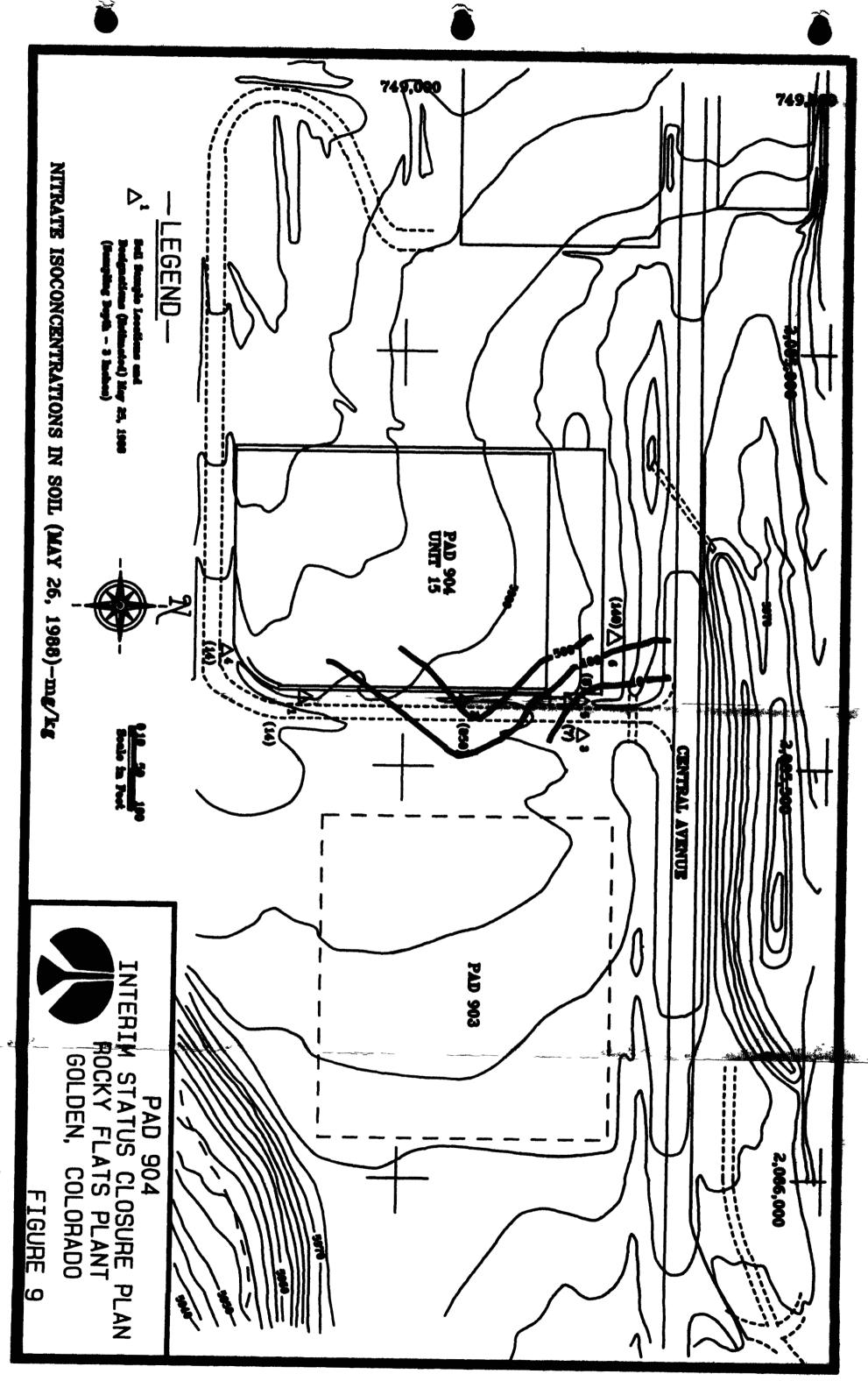
Sam ple Date	Nitrate mg/l			
9/14/88 Observations	72.6 1	Totals	36 Cum. % =	93.4
6/6/88 Observations	120 1	Totals	37 Cum. % =	96.1
6/6/88 Observations	178 1	Totals	38 Cum. % =	98.7

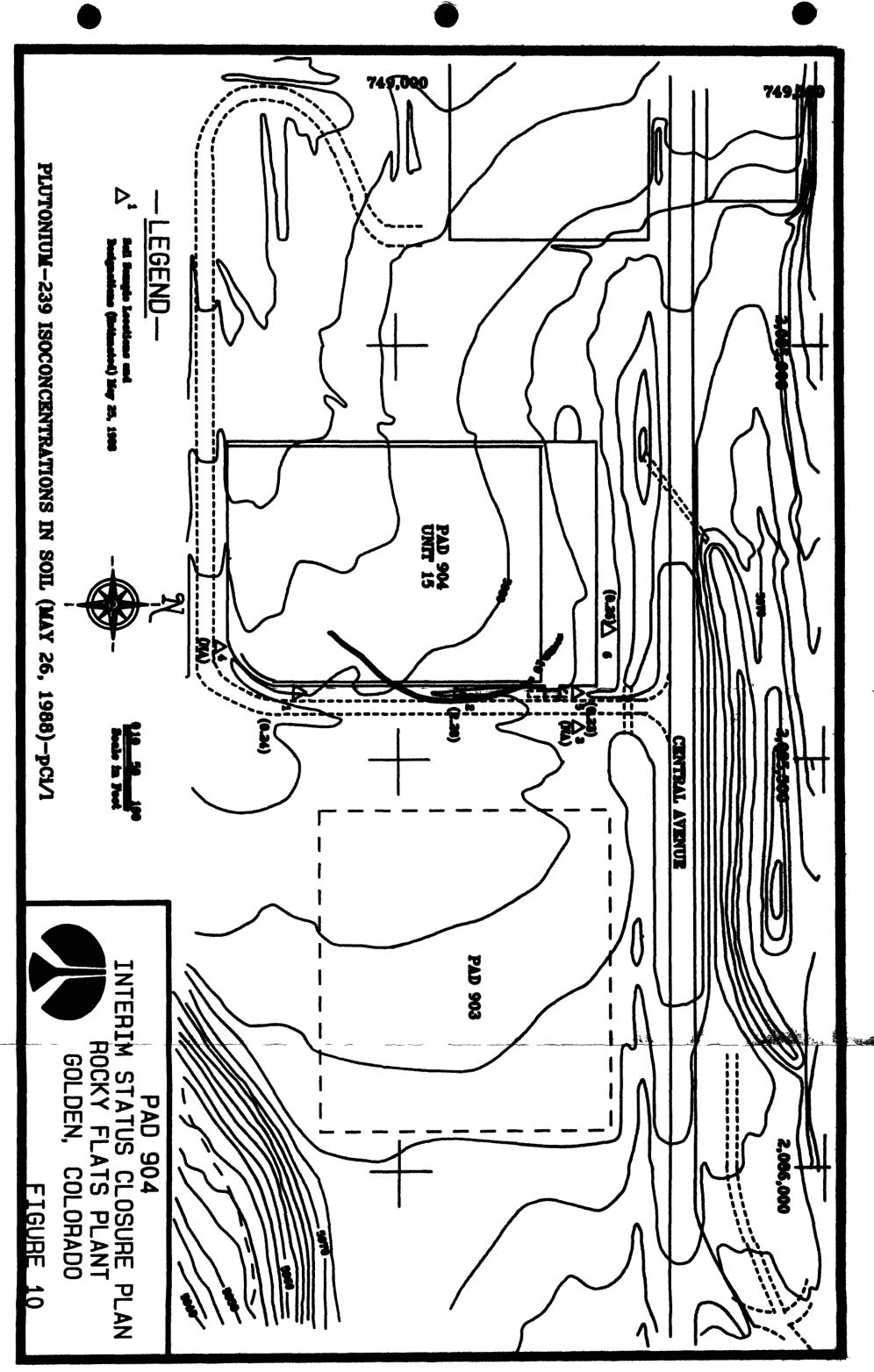


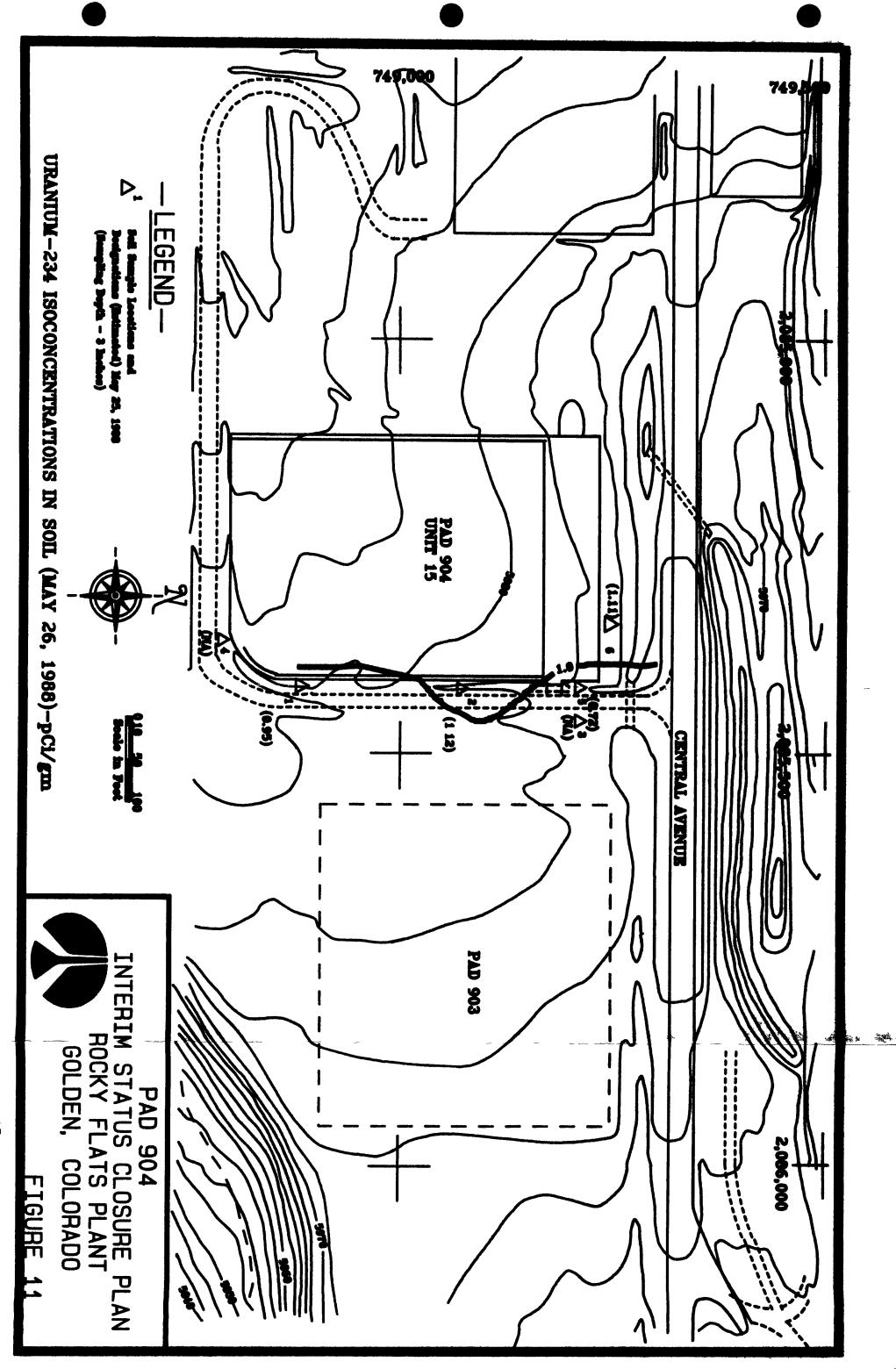




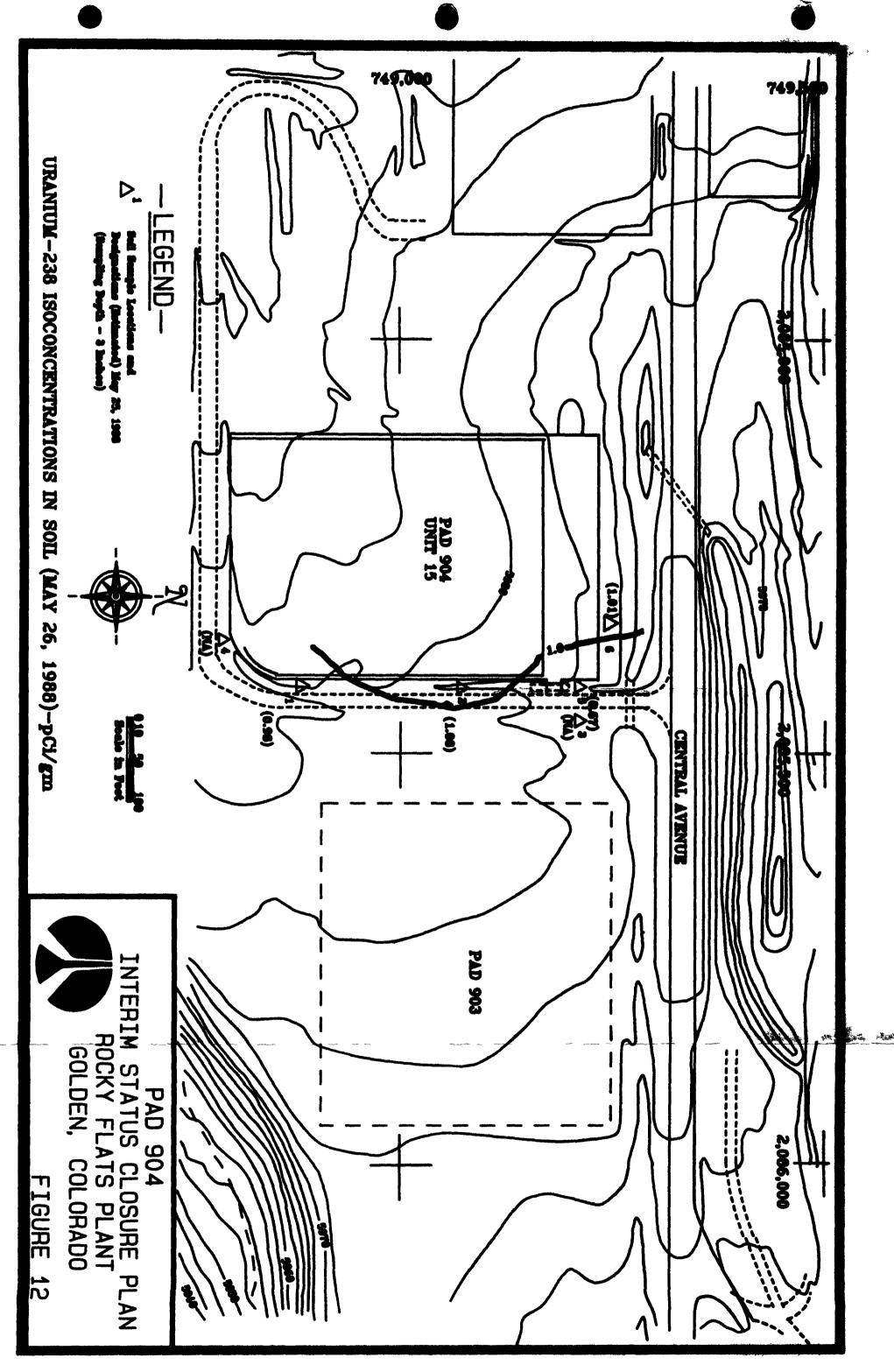


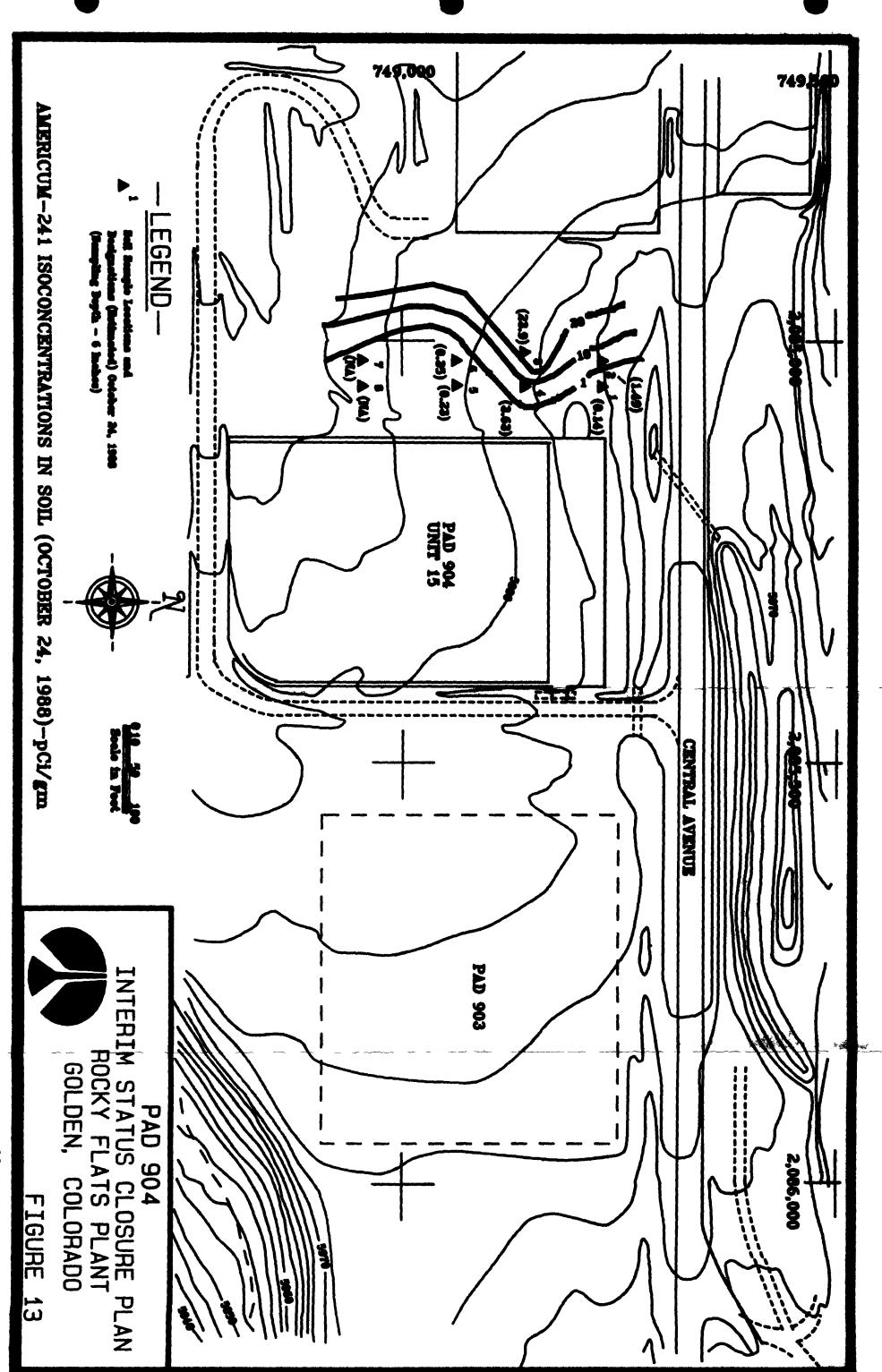


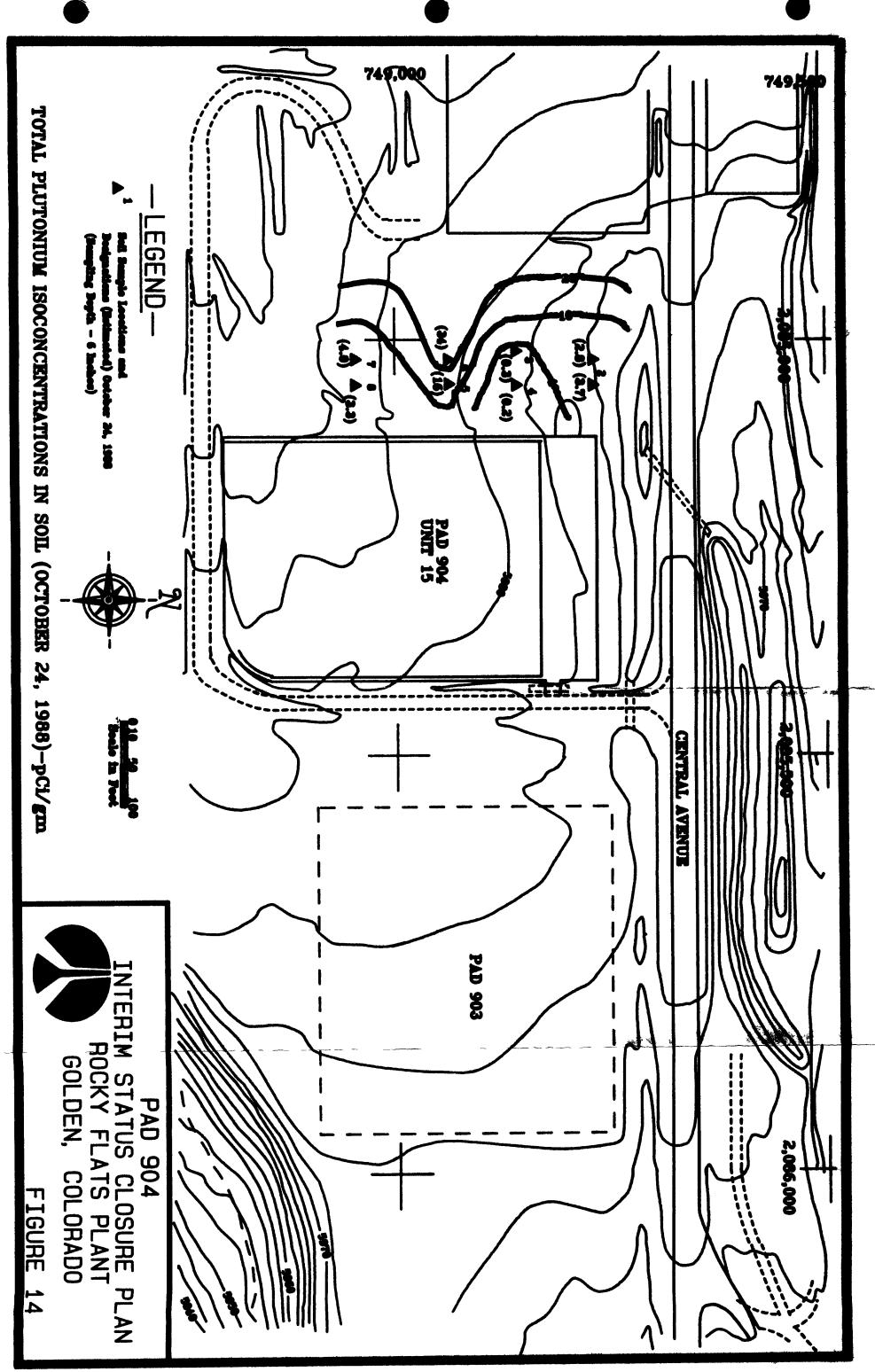


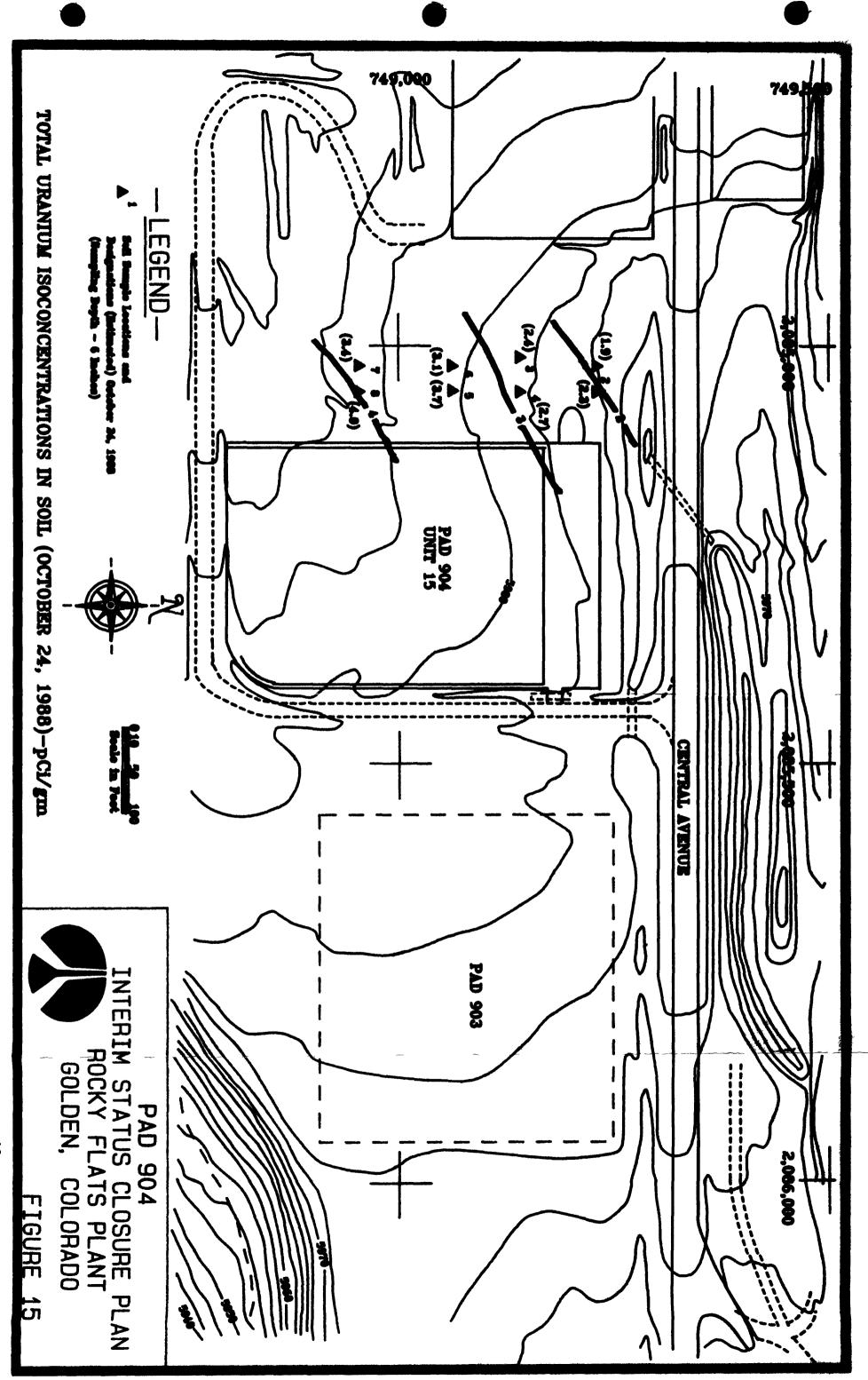


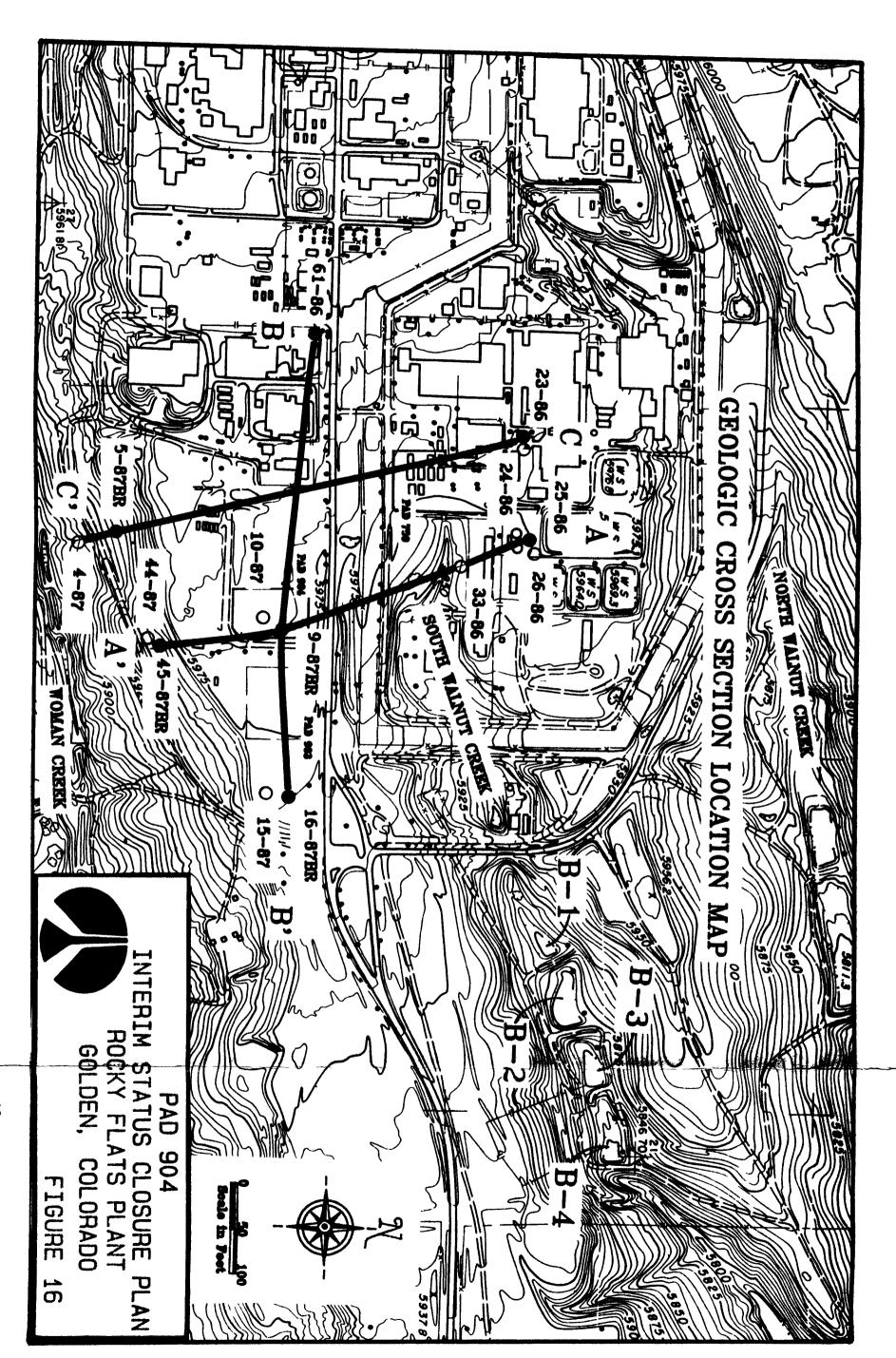
S

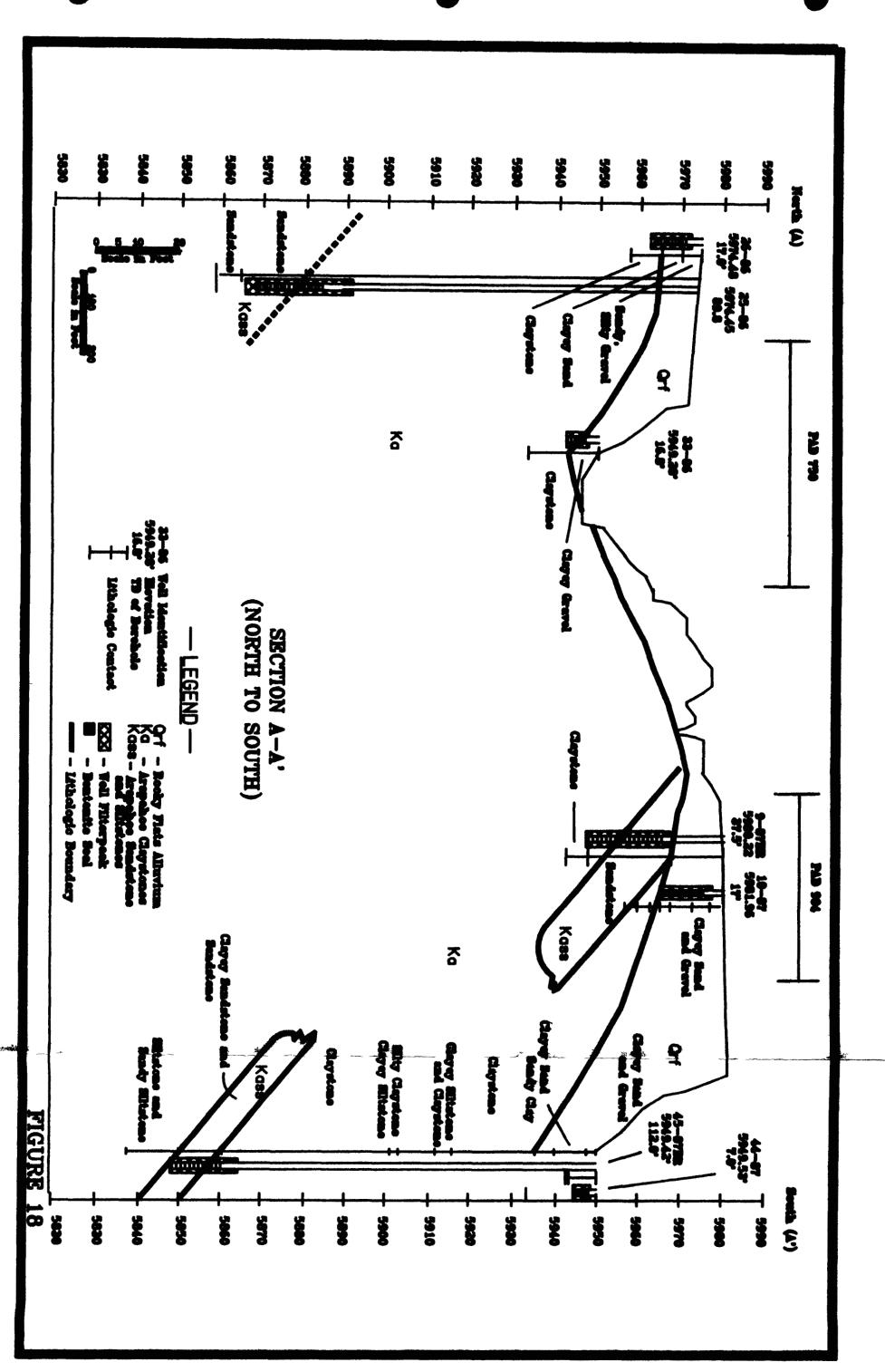












.

